CITY OF LONG BEACH

Park Tower Student Housing Project

Draft Environmental Impact Report

Lead Agency:

City of Long Beach
Long Beach Community Development Department, Planning Bureau
411 West Ocean Boulevard, 2nd Floor
Long Beach, California 90802
Contact: Ms. Gina Casillas

Prepared with the assistance of

Kimley-Horn and Associates, Inc.
660 S Figueroa St #2050
Los Angeles, CA 90017

December 2, 2024

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Acronyms

Acronym	Description
AB	Assembly Bill
ACCM	Asbestos-Containing Construction Materials
ACM	Asbestos Containing Material
AFV	Alternative Fuel Vehicles
AHPA	Archeological And Historic Preservation Act
AIA	Airport Influence Area
APA	Allowable Pumping Allocation
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ARPA	Archaeological Resources Protection Act
ASTM	American Society For Testing And Materials
BACT	Best Available Control Technology
BERD	Built Environment Resources Directory
BMP	Best Management Practice
BP	[Before Present]
BTU	British Thermal Units
C_2H_3Cl	Vinyl Chloride
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFÉ	Corporate Average Fuel Economy
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CC	Community Commercial
CCA	Community Commercial Automobile
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFA	California Department of Food And Agriculture
CDPH	California Department of Public Health
CEC	California Energy Commission
CEHD	Community, Economic & Human Development
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, And Liability Act
CFC	California Fire Code
CFR	Code Of Federal Regulations
CH_4	Methane
CHMIRS	California Hazardous Material Incident Report System
CNR	Neighborhood Commercial and Residential
CNRA	California Natural Resources Agency
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
COG	Council Of Governments
CPUC	California Public Utility Commission
CRHR	California Register of Historic Resources
CSULB	California State University, Long Beach
CUP	Conditional Use Permit

Acronym	Description
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
DA	Drainage Areas
DEH	Department Of Environmental Health
DHS	California Department of Health Services
DOF	California's Department of Finance
DOSH	Division Of Occupational Safety and Health
DOT	U.S. Department of Transportation
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
EDR	Environmental Data Resources
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act
EMFAC2021	Emissions Factor Model
EO	Executive Order
EPA	Environmental Protection Agency
EPCRA	Federal Emergency Planning and Community Right-To-Know Act
ERNS	Emergency Response Notification System
ESA	Environmental Site Assessment
EV	Electric Vehicle
EVCS	EV Charging Stations
EVSE	Ev Supply Equipment
FCAA	Federal Clean Air Act
FCN	Founding And Contemporary Neighborhood
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
GCC	Global Climate Change
GHG	Greenhouse Gas Emissions
GWP	Global Warming Potential
H_2S	Hydrogen Sulfide
HAZNET	Hazardous Waste Manifests
HCD	Housing and Community Development
HFCs	Hydrofluorocarbons
HMTA	Hazardous Materials Transportation Act
HVAC	Heating, Ventilation, and Cooling
IPCC	Intergovernmental Panel on Climate Change
ISO	Independent System Operator
ITE	Institution of Transportation Engineers
kWh	Kilowatt Hours
LARWQCB	Los Angeles Regional Water Quality Control Board
LBMC	Long Beach Municipal Code
LBP	Lead-Based Paint
LBT	Long Beach Transit
LBUD	Long Beach Utilities Department
LCP	Lead-Containing Paint
LEED®	Leadership In Energy and Environmental Design
LID	Low Impact Development
LOS	Level of Service
LST	Localized Significance Threshold
LUST	Leaking Underground Storage Tank
Metro	Metropolitan Transportation Authority
MFR-L	Multiple Family Residential Low Density
MLD	Most Likely Descendant
MPO	Metropolitan Planning Organization

Acronym	Description
MU-3	Mixed Use
MWELO	Model Water Efficient Landscape Ordinance
N_2	Nitrogen
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NAHC	Native American Heritage Commission
NCP	National Contingency Plan
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NIOSH	National Institute for Occupational Safety And Health
NO	Nitric Oxide
NO_2	Nitrogen Dioxide
NOP	Notice of Preparation
NOX	Nitrogen Oxides
NO_x	Nitric Oxide
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NPS	National Park Service
NSC-C	Neighborhood Serving Center or Corridor
NSC-L	Neighborhood Serving Center or Corridor- Low Density
NSC-M	Neighborhood Serving Center or Corridor - Moderate Density
O_2	Oxygen
O_3	Ozone
OBD	On-Board Diagnostic System
ODCs	Ozone Depleting Compounds
OEHHA	Office Of Environmental Health Hazard Assessment
OHP	California Office Of Historic Preservation
OPR	Office Of Planning And Research
OS	Open Space
OSHA	Occupational Safety And Health Administration
P	Park
Pb	Lead
PCFs	Perfluorocarbons
PM10	Particulate Matter Up To 10 Microns
PM2.5	Particulate Matter Up To 2.5 Microns
PRC	Public Resources Code
PRPA	Paleontological Resources Preservation Act
PVC	Polyvinyl Chloride
R-2-N	Two-Family Residential, Standard
R-4-R	Moderate-Density Multiple Residential
RCP	Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act
RECLAIM	Regional Clean Air Incentives Market
RHNA	Regional Housing Needs Assessment
ROGs	Reactive Organic Gases
RPS	California's Renewable Portfolio Standard
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Boards
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SB 350	Clean Energy and Pollution Reduction Act
SCAB	South Coast Air Basin

Acronym	Description
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SDWA	Safe Drinking Water Act
SF_6	Sulfur Hexafluoride
SHPO	State Historical Resources Commission
SHPOs	State Historic Preservation Officers
SIP	State Implementation Plan
SLF	Sacred Lands File
SMP	Soil Management Plan
SO	Sulphur Oxides
SO_2	Sulfur Dioxide
SO_4	Sulfates
SoCAB	South Coast Air Basin
SO_x	Sulfur Oxides
SP	Service Population
SPCC	Storage Tank Spill Prevention, Control, and Countermeasure
SRA	Source Receptor Area
SUSMP	Standard Urban Stormwater Mitigation Plan
SVP	Society For Vertebrate Paleontology
SWPPP	Storm Water Pollution Prevention
SWRCB	California State Water Resources Control Board
TAC	Toxic Air Contaminant
TCR	Tribal Cultural Resource
TDM	Transportation Demand Management Programs
TGA	Trip Generation Analysis
THPOs	Tribal Historic Preservation Officers
TIA	Traffic Impact Analysis
TPH	Total Petroleum Hydrocarbon
TSCA	Toxic Substances Control Act
U.S. EPA	U.S. Environmental Protection Agency
USACE	United States Army Corps of Engineers
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
WDR	Waste Discharge Requirements
WRD	Water Replenishment District of Southern California

Executive Summary

This document is an Environmental Impact Report (EIR) analyzing the environmental effects of the adaptive reuse of a seven-story office building with three levels of subterranean parking. The Project is located on 51,058 square feet sf (1.2 acres) triangular-shaped parcel located at 5150 Pacific Coast Highway in the City of Long Beach (City). This section summarizes the characteristics of the Project, alternatives to the Project, and the environmental impacts and mitigation measures associated with the Project.

Project Synopsis

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Project Location

The Project Site is located at 5150 Pacific Coast Highway in the eastern part of the City of Long Beach. The Project Site consists of one parcel (Los Angeles County Assessor Parcel Number [APN 7220-018-009). The Project Site is located on a 51,048 sf (1.2 acres) triangular-shaped (Project Site). The Project Site is currently development with a seven-story office building with three levels of subterranean parking. The existing office building is approximately 120,000 sf of which 109,600 sf is currently leased. The Project Site is generally bounded by the Pacific Coast highway to the north and east, East Anaheim to the south, and Clark Avenue to the west. The Project Site is surrounded by commercial, office, residential, and religious uses to the north and east past the Pacific Coast Highway; a recreational golf course (Recreational Park Golf Course 18) to the south; and commercial and residential uses to the west. The Project is regionally accessible from the Pacific Coast Highway and the San Diego Freeway (I-405) located 1.4 miles north of the Project Site.

Project Description

This EIR has been prepared to examine the potential environmental effects of the Park Tower Student Housing Project. The following is a summary of the full Project description, which can be found in **Chapter 2, Project Description**.

The Project proposes to adaptively reuse an existing seven-story office building with three levels of subterranean parking into a private dormitory (housing for students). [1]

The first level of the Project would consist of administrative/management offices and various amenities including a lobby, mail room, kitchen and dining area, study room, laundry facilities, fitness area, and a men and women's locker room. The 149 student residential suites (593 beds) would be located on the second to seventh floor. The Project would include 12 one-person suites, 2 two-person suites, 7 three-person suites, 96 four-person suites, 20 five-person suites, and 12 six-person suites, totaling approximately 73,486 sf of residential area. The Project would construct a new 728 sf pavilion building that is designed to activate the street front along Clark Avenue. The Project would utilize the three levels of existing subterranean vehicular parking and would include a total of 364 parking stalls (218 standard spaces, 19 accessible spaces, 127 tandem spaces). The Project would also include 150 bicycle parking spaces on the first level of subterranean parking. The Project would include minimal amounts of excavation necessary for pool construction and the installation of utilities to the building. The Project would incorporate new accessible at-grade open space as well as indoor and outdoor common and private open space for Project residents and guests. The Project would provide an approximately 22,523 sf of open space that would include student plaza, benches, lounging areas, pool, patio, outdoor BBQs and picnic tables, lawn area, shade structure, planters, and landscaping. Open space areas on the ground floor would be accessed from the entrance of Pacific Coast Highway, East Anaheim Street, Clark Avenue, as well as from the interior of the Project Site from the ground -floor parking level or via subterranean parking exit stairs.

Project Objectives

The underlying purpose and primary objective of the Project is to adaptively reuse an existing office building and transform it into a private dormitory (housing for students). The Project would include campus style residential suites and private open space and other amenities. As further required by the CEQA Guidelines, the specific objectives of the Project are provided below:

- Fulfill the city's housing goals by improving access to high quality housing and expanding student housing opportunities in proximity to open space, public transportation, and a wide range of services and goods.
- Promote sustainable development through the adaptive reuse of an existing seven-story office building into a 593-bed student housing development that includes supportive uses and amenities that promote interaction and communication between students such as large lounge areas and active outdoor recreational areas.
- Promote pedestrian and bicycle safety and access to the Project Site by engaging with the existing dedicated bike throughfare along Pacific Coast Highway with bicycle parking and lockers on the subterranean parking level 1.
- Increase access to alternative transportation options on the Project Site including zip cars and electric scooters. Increase accessibility to the Project Site through a dedicated ride share pick-up and drop-off locations along East Anaheim Street.

[1] Section 21.15.590 of Long Beach Municipal Code: "Communal housing" means housing for nonfamily groups with common kitchen and dining facilities but without medical, psychiatric or other care. Communal housing includes boarding house, lodging house, dormitory, fraternity house, commune, and religious home. Communal housing does not include handicapped or senior citizen housing, residential care facility, or convalescent hospital or parsonage.

- Provide a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design, including light materiality, landscape features, and active ground floor uses with open space amenities.
- Provide safe student housing through terraced landscape buffers and a security fence and gate.
- Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions through such features as solar photovoltaic power, electric vehicle charging stations, energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping.

Required Project Approvals

In compliance with Sections 15050 and 15367 of the CEQA Guidelines, the City of Long Beach has been designated as the "lead agency," which is defined as "the public agency which has the principal responsibility for carrying out or approving a project." Approvals by the lead agency required for development of the Project include, but may not be limited to the following:

The Project would require adoption by the Long Beach Planning Commission/City Council and the following discretionary approvals:

- General Plan Amendment/Map changing Community Commercial (CC) Land Use District to Land Use Element (LUE) Neighborhood Serving Center or Corridor (NSC-Moderate) Placetype;
- Zoning Code Amendment/Map Change from Community Commercial Automobile-Oriented (CCA) Zoning District to Mixed Use (MU-3) Zoning District;
- Conditional Use Permit for the Special Group Residence use for the dormitory use;
- Site Plan Review for the Adaptive Reuse of the building;
- Building Permits for the change in use of the building;
- Certification of the EIR for the Project;
- A street improvement encroachment permit from Caltrans for activities within the Pacific Coast Highway right-of-way; and
- Other ministerial approvals as needed and as may be required

Summary of Impacts and Mitigation Measures

Table ES-1, Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts, summarizes the environmental impacts of the Project, mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold of significance given reasonably available and feasible mitigation measures. Such an impact requires issuance of a Statement of Overriding Considerations if the Project is approved per CEQA Guidelines Section 15093.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the significance threshold given reasonably available and feasible mitigation measures. Such an impact requires findings under CEQA Guidelines Section 15091.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold of significance and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact:** The Project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

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Table ES-1: Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impacts	Mitigation Measures	Residual Impacts
Aesthetics (As described in the Initial Study, Appendix A)		
Impact AES-1: Would the project have a substantial adverse effect on a scenic vista?	None Required	No Impact
Impact AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	None Required	No Impact
Impact AES-3: Would the project, if in nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	None Required	Less than Significant Impact
Impact AES-4: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	None Required	Less than Significant Impact
Agriculture and Forestry Resources (As described in the Initial Study, Appendix A)		
Impact AG-1: Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	None Required	No Impact
Impact AG-2: Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	None Required	No Impact
Impact AG-3: Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	None Required	No Impact
Impact AG-4: Would the project result in the loss of forest land or conversion of forest land to non-forest use?	None Required	No Impact
Impact AG-5: Would the project Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?	None Required	No Impact
4.2 Air Quality		

Impacts	Mitigation Measures	Residual Impacts
Impact AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?	None Required	Less than Significant Impact
Impact AQ-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?	None Required	Less than Significant Impact
Impact AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?	None Required	Less than Significant Impact
Impact AQ -4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	None Required	Less than Significant Impact
Biological Resources (As described in the Initial Study, included in Appendix A)		
Impact BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	None Required	Less than Significant Impact
Impact BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	None Required	Less than Significant Impact
Impact BIO-3: Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	None Required	Less than Significant Impact
Impact BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	None Required	Less than Significant Impact
Impact BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	None Required	Less than Significant Impact
Impact BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	None Required	No Impact
4.3 Cultural Resources		

Impacts	Mitigation Measures	Residual Impacts
Impact CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	None Required	No Impact
Impact CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	**Mitigation Measure CUL-1, Inadvertent Discovery of Cultural Resources:** In the event that any subsurface cultural resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities within 50 feet of the discovery shall halt immediately. The applicant shall notify the City and consult with a Secretary of Interior qualified archaeologist who shall evaluate the find in accordance with federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. For any resources of Native American origin, the City shall also contact the Tribes that elected to consult on the Project to identify its potential as a Tribal Cultural Resource (TCR). Should the resource, in consultation between the City and Tribe(s), be determined a TCR, the City shall also consult with Tribes regarding avoidance, or other measures recommended by the consultant. All identified cultural resources will be recorded on appropriate CA DPR 523 series forms and evaluated for significance. All records will be submitted to the City of Long Beach, Consulting Tribe(s), and South-Central Coastal Information Center (SCCIC).	Less than Significant Impact with Mitigation
Impact CUL-3: Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	**Mitigation Measure CUL-2, Inadvertent Discovery of Human Remains:** If human remains are encountered during the undertaking, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.	Less than Significant Impact with Mitigation
4.4 Energy		
Impact ENG-1: Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	None Required	Less than Significant Impact

Impacts	Mitigation Measures	Residual Impacts
Impact ENG-2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	None Required	Less than Significant Impact
4.5 Geology and Soils		
impact GEO-1i: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	None Required	No Impact
Impact GEO-1ii:Strong seismic ground shaking?	None Required	Less than Significant Impact
Impact GEO-1iii: Seismic-related ground failure, including liquefaction?	None Required	No Impact
Impact GEO-1iv: landslides?	None Required	No Impact
Impact GEO-2: Result in substantial soil erosion or the loss of topsoil?	None Required	Less than Significant Impact
Impact GEO-3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse??	None Required	No Impact
Impact GEO-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	None Required	No Impact
Impact GEO-5: Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	None Required	No Impact
Impact GEO-6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	**Mitigation Measure GEO-1, Paleontological Monitoring.** In the event paleontological resources are encountered during construction of the Project, the City shall be immediately informed of the discovery. All work shall cease in the area of the find, and a qualified paleontologist shall be retained by the Applicant to evaluate the find before restarting work in the area. A qualified paleontologist is a paleontologist who meets the Society of Vertebrate Paleontology (SVP) standards for Qualified Professional Paleontologist, which is defined as an individual preferably with an M.S. or Ph.D. in	Less than Significant with Mitigation

Impacts	Mitigation Measures	Residual Impacts
	paleontology or geology, who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California (preferably Southern California), and who has worked as a paleontological mitigation Project supervisor for a least one year. The City shall require that all paleontological resources identified on the Project Site be assessed and treated in a manner determined by the qualified paleontologist. The qualified paleontologist shall be empowered to halt or divert ground disturbing activities. **Mitigation Measure GEO-2, Paleontological Documentation.** Fossil remains collected during the monitoring process will be salvaged and will be cleaned, repaired, sorted, and catalogued. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, will be deposited (as a donation) in a scientific institution with permanent paleontological collections located within the County (or, if no repository is available, adjacent Counties). A final data recovery report will be completed by a qualified paleontologist. This report will include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils. The report will be submitted to the Lead Agency upon completion.	
4.6 Greenhouse Gas Emissions		
Impact GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	None Required	Less than Significant Impact
Impact GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	None Required	Less than Significant Impact
4.7 Hazards and Hazardous Materials		
Impact HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	None Required	Less than Significant Impact
Impact HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	None Required	Less than Significant Impact
Impact HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	None Required	Less than Significant Impact

Impacts	Mitigation Measures	Residual Impacts
Impact HAZ-4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	None Required	No Impact
Impact HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	None Required	Less than Significant Impact
Impact HAZ-6: Impair implementation of or physically interfere within an adopted emergency response plan or emergency evacuation plan	None Required	Less than Significant Impact
Impact HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildfires?	None Required	Less than Significant Impact
4.8 Hydrology and Water Quality		
Impact HWQ-1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	None Required	Less than Significant Impact
Impact HWQ-2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	None Required	Less than Significant Impact
Impact HWQ-3a: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on or off-site?	None Required	Less than Significant Impact
Impact HWQ-3b: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	None Required	Less than Significant Impact
Impact HWQ-3c: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or	None Required	Less than Significant Impact

Impacts	Mitigation Measures	Residual Impacts
through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?		
Impact HWQ-3d: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?	None Required	Less than Significant Impact
Impact HWQ-4: Would the project if in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	None Required	No Impact
Impact HWQ-5: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	None Required	Less than Significant Impact
4.9 Land Use and Planning		
Impact LUP-1: Would the project physically divide an established community?	None Required	No Impact
Impact LUP-2: Would the project 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?	None Required	Less than Significant Impact
Mineral Resources (As described in the Initial Study, included in Appendix A)		
Impact MIN-1: Would the project result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	None Required	No Impact
Impact MIN-2: Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	None Required	No Impact
4.10 Noise		
Impact NOI-1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	None Required	Less than Significant Impact
Impact NOI -2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?	None Required	Less than Significant Impact
Impact NOI -3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such	None Required	No Impact

Impacts	Mitigation Measures	Residual Impacts
a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?		
4.11 Population and Housing		
Impact POP-1: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	None Required	Less than Significant Impact
Impact POP-2: Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	None Required	No Impact
Public Services (As described in the Initial Study, included in Appendix A)		
Impact PUB -1: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection?	None Required	Less than Significant Impact
Impact PUB -2: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection?	None Required	Less than Significant Impact
Impact PUB -3: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools?	None Required	Less than Significant Impact
Impact PUB-4: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the	None Required	Less than Significant Impact

Impacts	Mitigation Measures	Residual Impacts
construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks?		
Impact PUB-5: Would the project Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other services?	None Required	Less than Significant Impact
Recreation (As described in the Initial Study, included in Appendix A)		
Impact REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	None Required	Less than Significant Impact
Impact REC-2: Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	None Required	Less than Significant Impact
4.12 Transportation		
Impact TRA-1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	None Required	Less than Significant Impact
Impact TRA-2: Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	None Required	Less than Significant Impact
Impact TRA -3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	None Required	No Impact
Impact TRA -4: Would the project result in inadequate emergency access?	None Required	Less than Significant Impact
4.13 Tribal Cultural Resources		
Impact TCR -1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value	None Required	No Impact

Impacts	Mitigation Measures	Residual Impacts
to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?		
Impact TCR -2: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	**Mitigation Measure TCR-1, Retain a Native American Monitor Prior to Commencement of Ground Disturbing Activities:** The Project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject Project at all Project locations (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.	Less than Significant Impact with Mitigation
4.14 Utilities and Service Systems		
Impact UTI -1: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	None Required	Less than Significant Impact
Impact UTI -2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	None Required	Less than Significant Impact
Impact UTI-3: Would the project result in a determination by the wastewater treatment provider which services of may serve the project that is has adequate capacity to serve the project's projected demand in addition to the provider's existing commitment?	None Required	Less than Significant Impact
Impact UTI-4: Generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure?	None Required	Less than Significant Impact
Impact UTI-5: Generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure?	None Required	Less than Significant Impact
Wildfire (As described in the Initial Study, included in Appendix A)		

Impacts	Mitigation Measures	Residual Impacts
Impact WF-1: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	None Required	No Impact
Impact WF-2: Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	None Required	No Impact
Impact WF-3: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	None Required	No Impact
Impact WF-4: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	None Required	No Impact

Areas of Known Controversy and Issues to be Resolved

CEQA Guidelines Section 15123(b)(2) requires that an EIR identify areas of controversy known to the lead agency, including issues raised by agencies and the public.

As part of the preparation of the EIR, an effort was made to contact State, regional, and local government agencies and interested parties to solicit comments and inform the public of the Project. This included the distribution of a Notice of Preparation (NOP) and an Initial Study and a public scoping meeting.

The City circulated an NOP and Initial Study for the EIR to State, regional, and local agencies, and members of the public for a 30-day public review period. The public review period began Monday, August 12, 2024, and concluded Friday, September 13, 2024. The purpose of the NOP and Initial Study was to formally notice that the City was preparing an EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the EIR. The Initial Study limited the focus of the EIR to those environmental factors that cannot be determined to be "Less than Significant" in the EIR and scoped out environmental factors that were determined to be "Less than Significant" and "No Impact".

The NOP included notice of an EIR Scoping Meeting. The purpose of the EIR Scoping Meeting was for the City to solicit input and verbal and written comments from agencies and the public on environmental issues or alternatives they believe should be addressed in the EIR. The EIR Scoping Meeting was held virtually on Wednesday, August 21, 2024, between 5:00 p.m. and 6:00 p.m. using the Zoom video communications platform. A presentation explaining the Project was provided and attendees were given an opportunity to provide their comments on the scope of the EIR. Two members of the public attended the EIR Scoping Meeting. No comments were received from meeting participants during the scoping meeting.

Three written comment letters were received during the scoping period which began on Monday, August 12, 2024, and concluded Friday, September 13, 2024. The presentation from the EIR Scoping Meeting and written comments received during the scoping period are provided in **Appendix A, Public Involvement**

In general, areas of potential controversy known to the City of Long Beach include air quality and transportation. These issues were considered in the preparation of this EIR, where appropriate, and are addressed in the environmental impact analyses presented in Chapter 4 of this EIR.

Project Alternatives

CEQA Guidelines Section 15126.6(a) requires that an EIR "describe a range of reasonable alternatives to the project, or to the location of the 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." Four Alternatives to the Project have been identified and analyzed. Each of the four alternatives is summarized below and evaluated in sufficient detail (see Chapter 5) to determine whether the overall environmental impacts would be "less than", "similar to", or "greater than" the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project objectives could be substantially attained by the alternative. The comparative impacts of the Project and the alternatives are summarized in **Table ES-2: Alternatives and Project Comparison**, below.

Based on this alternatives analysis, and as required by CEQA, an environmentally superior alternative is identified.

Alternative 1: No Build/No Project Alternative

Pursuant to Section 15126.6(e)(3)(B) of the CEQA Guidelines, Alternative 1, the "No Build/No Project" Alternative, represents the circumstance under which the Project does not proceed. Alternative 1 assumes that the existing development on the Project Site would remain as is and no new development would be implemented. As discussed in **Chapter 2, Project Description**, of this EIR, the Project Site is a 51,048 square feet (sf) (1.2 acres) triangular shaped parcel currently developed with a seven-story office building and three levels of subterranean parking built in 1981. The existing office building is approximately 120,000 sf, of which 109,600 sf is currently leased (as of January 2024). The western side of the Project Site adjacent to Clark Avenue includes a surface parking lot, driveway, and landscaping. There is signage for the existing office building on the northern corner of the Project Site along Pacific Coast Highway. Under Alternative 1, the Project Site and existing facilities would remain unchanged.

Alternative 2: Market Rate Housing

Alternative 2 would adaptively reuse the existing building and develop market-rate housing. Alternative 2 would include 149 units, comprised of 65 one-bedroom, 44 two-bedroom, and 40 three-bedroom apartments, resulting in approximately 273 bedrooms total. Under Alternative 2, the first floor would include amenities for the residents, including a laundry room, mailroom, loungeroom, and theatre. Outdoor amenities would include a dog park, outdoor BBQ with picnic tables, a flexible lawn with artificial turf, and an outdoor patio. An outdoor pool would be provided. The second to seventh floor would consist of residential units. Parking would be provided in the existing three levels of subterranean parking. Alternative 2 would be subject to AB 2097 parking requirements and would not enforce minimum parking requirements as the Project Site is located within one-half mile of public transit options including LBT bus service and the CSULB Beachside shuttle. Therefore, Alternative 2 would not be subject to parking minimums established by LBMC. Alternative 2 would provide 273 standard parking spaces for residents.

Alternative 3: Senior Living and Student Housing

Alternative 3 would adaptively reuse the existing building and develop senior and student housing. The first floor would provide an administrative office, an industrial kitchen, and medicine storage for the senior living residents. Additionally, a shared laundry room, a mailroom, a communal lounge, and a fitness room would be provided on the ground floor for the seniors and students. Outdoor amenities would include a residential gardening area, dining patio, and a flexible lawn with artificial turf. No outdoor pool would be provided. Senior housing would be provided on the second and third floors. Student housing would be provided on the fourth through seventh floor. Alternative 3 would provide 50 one-bedroom units for seniors and 395 beds for student housing. The student housing portion of Alternative 3 would be comprised of 125 one-bedroom, 75 two-bedroom, and 40 three-bedroom units, resulting in a total of 240 dwelling units with 395 beds overall for student housing. Each student housing floor would have its own shared lounge and kitchen. Additional amenities located on the student floors would include a fitness area and study rooms on the fourth through seventh floors. There would be a total of 290 dwelling units total. Alternative 3 would be subject to AB 2097 parking requirements as the site would be located within one-half mile of public transit options including LBT bus service and the CSULB Beachside

shuttle. Therefore, Alternative 3 would provide 50 spaces for the senior living component (e.g., residents and employees) and would provide one parking spot per student resident (395 spaces). Therefore, Alternative 3 would provide a total of 445 parking spaces to serve the senior living uses and student housing.

Alternative 4: Student Housing and Office Space

Alternative 4 would adaptively reuse the existing building and develop student housing and office space. Alternative 4 would provide separate entrances and elevators that lead to student dormitories and office space. The ground floor would provide student amenities, including a mailroom, industrial kitchen, dining area, communal lounge space, laundry facilities, fitness area, and a men and women's locker room. Outdoor amenities would include an outdoor dining patio, patio, and fitness turf with equipment. No outdoor pool would be provided.

The second to fifth floor would provide 240 dwelling units comprised of 125 one-bedroom, 75 two-bedroom, and 40 three-bedroom units, resulting in the 395 beds overall for student housing. The sixth and seventh floor would provide 34,300 square feet of office space. According to SCAG employee generation rates from the SCAG 2001 Employment Density Study Summary Report, a high-rise office space in Los Angeles County would require 440 average sf per employee. Therefore, the 34,300 square feet of office space would result in approximately 77 office employees. Alternative 4 would maintain the existing three levels of subterranean parking. Alternative 4 would be subject to AB 2097 parking requirements and would not enforce minimum parking requirements on a residential and commercial Project if the Project is located within one-half mile of public transit. Alternative 4 would be subject to AB 2097 parking requirements as the site would be located within one-half mile of public transit options including LBT bus service. Therefore, Alternative 4 would provide one parking spot per student (395 spaces) and would provide 77 spaces for the office component. Therefore, Alternative 4 would provide a total of 472 parking spaces to serve the student housing and office uses.

Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. Selection of an environmentally superior alternative is based on comparison of the alternatives to determine which among the alternatives would reduce or eliminate the impacts associated with the Project to the greatest degree.

Of the alternatives analyzed in this Draft EIR, Alternative 1: No Build/No Project, would be considered the environmentally superior alternative because it would not involve new development and assumes that the Project Site would operate under existing conditions. Although Alternative 1 would not meet any of the Project objectives, it would avoid all of the Project's less than significant impacts with mitigation and would have reduced impacts compared to the Project. However, because Alternative 1 has been identified as the environmentally superior alternative, identification of another environmentally superior alternative is required.

Alternative 3, Senior Living and Student Housing, and Alternative 4: Student Housing and Office Space would not include an outdoor pool and therefore would require less construction equipment and result in less vibration during construction. Therefore, Alternative 3, and 4 would result in a

less than significant impact to air quality, greenhouse gas emissions, and noise at a lesser degree than the Project.

Alternative 2 would not provide student housing, and therefore, would not provide housing for special needs residents. Additionally, as outlined in the City's General Plan Housing Element, the City's RHNA allocation of housing between October 2021 and October 2029 has an objective of constructing 26,502 new units. The proposed 149 market rate housing units for Alternative 2 would represent approximately 0.6 percent of the number of new units planned to be constructed by the City per the Housing Element. Therefore, Alternative 2 would provide a number of dwelling units similar to the Project and would therefore assist the City in reaching it's RHNA allocations to the same degree as the Project. However, by providing only market rate housing, Alternative 2 would not address all the goals and policies outlined in the City of Long Beach General Plan, including Goal 4 of the Housing Element, which aims to provide housing for special needs residents such as students. Alternative 4 would provide a total of 240 units which would represents 0.9 percent of the anticipated increase for the City by 2050. However, Alternative 4 would only provide 395 beds for students; therefore reducing the number of units available for special needs residents in the City of Long Beach.

Alternative 3 would be considered the environmentally superior alternative because impacts would be similar or less than the Project. Furthermore, Alternative 3 would provide housing for special needs residents in the City including seniors and students as outlined in the City of Long Beach General Plan and would allow the City to reach its RHNA goals. The proposed 290 units for Alternative 3 would represent approximately 1 percent of the number of new units planned to be constructed by the City per the Housing Element. Therefore, Alternative 3 would provide a greater number of units than the Project. However, Alternative 3 does not meet the Project objectives of constructing new student housing near open space, public transportation, and services and goods to the same degree as the Project. Alternative 3 would only provide 395 beds compared to 593-beds for students under the Project.

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Table ES-2: Alternatives and Project Comparison

Environmental Issue Area	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
Aesthetics	No Impact	**Avoid**. Existing conditions would remain the same and therefore there would be no impact.	**Similar**. Alternative 2 would adaptively reuse the Project Site for market rate housing. Impacts to aesthetics would be similar compared to the Project. There would be no impact.	**Similar**. Alternative 3 would adaptively reuse the Project Site for Senior Living and Student Housing. Impacts to aesthetics would be similar compared to the Project. There would be no impact.	**Similar**. Alternative 4 would adaptively reuse the Project Site for Student Housing and Office Space. Impacts to aesthetics would be similar compared to the Project. There would be no impact.
Agriculture and Forestry	No Impact	**Avoid**. Existing conditions would not conflict with agricultural and forest land. There would be no impact.	**Similar**. Alterative 2 would not conflict with agricultural and forest land. There would be no impact.	**Similar**. Alternative 3 would not conflict with agricultural and forest land. There would be no impact.	**Similar**. Alternative 4 would not conflict with agricultural and forest land. There would be no impact.
Air Quality	Less than Significant Impact	**Avoid**. The existing air emissions would remain the same. Therefore, impacts would be less than significant.	**Less**. Emissions for construction activities would be similar for construction. Emissions for operation would be less than the Project. Impacts would be less than significant.	**Less.** Alternative 3 would not include a pool; therefore, there would be less equipment used and less emissions. Operational emissions would be less than the Project due to fewer people and VMT. Impacts would be less than significant.	**Less**. Alternative 4 would not include a pool; therefore, there would be less equipment used and less emissions. Operational emissions would be less than the Project due to fewer people and VMT. Impacts would be less than significant.
Biological Resources	Less than Significant Impact	**Avoid**. Alternative 1 would not affect any candidate, sensitive, or special status species. Therefore, there would be no impact.	**Similar**. Alternative 2 would not affect any candidate, sensitive or special status species. Impacts would be less than significant.	**Similar**. Alternative 3 would not affect any candidate, sensitive or special status species. Impacts would be less than significant.	**Similar**. Alternative 4 would not affect any candidate, sensitive or special status species. Impacts would be less than significant.
Cultural Resources	Less than Significant Impact with Mitigation	**Avoid**. No demolition or ground disturbance would occur and therefore there would be no impacts.	**Similar**. The existing structure would be repurposed; however, construction activities could disturb cultural	**Similar**. The existing structure would be repurposed; however, construction activities could disturb cultural	**Similar**. The existing structure would be repurposed; however, construction activities could disturb cultural

Environmental Issue Area	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
			resources. Impacts would be less than significant with mitigation.	resources. Impacts would be less than significant with mitigation.	resources. Impacts would be less than significant with mitigation.
Energy	Less than Significant Impact	**Avoid**. The existing energy use would remain the same, as no new development would occur. Therefore, there would be no impacts.	**Less**. The existing structure would be adaptively reused. Energy consumption would be less than the Project due to a smaller population. Impacts would be less than significant.	**Less**. The existing structure would be adaptively reused. Energy consumption would be less than the Project due to a smaller population. Impacts would be less than significant.	**Less**. The existing structure would be adaptively reused. Energy consumption would be less than the Project due to a smaller population. Impacts would be less than significant.
Geology and Soils	Less than Significant with Mitigation	**Avoid**. Existing conditions would remain the same. Therefore, there would be no impacts.	**Similar**. The existing structure would be repurposed for market rate housing, and would potentially expose people or structures to potential adverse effects, including the risk of loss, injury, or death. Alternative 2 would result in a similar risk of encountering an unknown unique paleontological resource; however, impacts would be less than significant with mitigation.	**Similar**. The existing structure would be repurposed for market rate housing, and would potentially expose people or structures to potential adverse effects, including the risk of loss, injury, or death. Alternative 3 would result in a similar risk of encountering an unknown unique paleontological resource; however, impacts would be less than significant with mitigation.	**Similar**. The existing structure would be repurposed for market rate housing, and would potentially expose people or structures to potential adverse effects, including the risk of loss, injury, or death. Alternative 4 would result in a similar risk of encountering an unknown unique paleontological resource; however, impacts would be less than significant with mitigation.
Greenhouse Gas Emissions	Less than Significant Impact	**Avoid**. The existing baseline GHG emissions would remain the same, as no new development would occur. Therefore, there would be no impacts.	**Less**. The existing structure would be repurposed for market rate housing, fewer bedrooms, and vehicle miles traveled during operations. Emissions would be less than the	**Less**. The existing structure would be repurposed for market rate housing, fewer bedrooms, and vehicle miles traveled during operations. Emissions would be less than the	**Less**. The existing structure would be repurposed for market rate housing, fewer bedrooms, and vehicle miles traveled during operations. Emissions would be less than the

Environmental Issue Area	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
			Project. Impacts would be less than significant.	Project. Impacts would be less than significant.	Project. Impacts would be less than significant.
Hazards and Hazardous Materials	Less than Significant Impact	**Avoid**. Alternative 1 would not introduce hazards or hazardous materials during Project construction and operation. Therefore, there would be no impacts.	**Similar**. Construction activities would be required to comply with CalOSHA standards, SCAQMD rules, SWPPP, and the SMP. Therefore, impacts would be less than significant.	**Similar**. Construction activities would be required to comply with CalOSHA standards, SCAQMD rules, SWPPP, and the SMP. Therefore, impacts would be less than significant.	**Similar**. Construction activities would be required to comply with CalOSHA standards, SCAQMD rules, SWPPP, and the SMP. Therefore, impacts would be less than significant.
Hydrology and Water Quality	Less than Significant Impact	**Avoid**. The No Project Alternative would not alter the existing drainage patten of the site or area. Therefore, no impact would occur.	**Similar**. The existing structure would be repurposed, and the Alternative would not alter existing drainage pattern of the site or area. Therefore, impacts would be less than significant.	**Similar**. The existing structure would be repurposed, and the Alternative would not alter existing drainage pattern of the site or area. Therefore, impacts would be less than significant.	**Similar**. The existing structure would be repurposed, and the Alternative would not alter existing drainage pattern of the site or area. Therefore, impacts would be less than significant.
Land Use and Planning	Less than Significant Impact.	**Avoid**. Alternative 1 would not alter the existing building; therefore Alternative 1 would not conflict with any land use plan, policy, or regulation. Impacts would be less than significant.	**Similar**. Alternative 2 would not conflict with any land use plan, policy, or regulation. Alternative 2 would require a General Plan Amendment and Zoning Code Amendment/Map Change Upon approval, the Project Site would be able to accommodate Alternative 2.	**Similar**. Alternative 3 would not conflict with any land use plan, policy, or regulation. Alternative 3 would require a General Plan Amendment and Zoning Code Amendment/Map Change Upon approval, the Project Site would be able to accommodate Alternative 3.	**Similar**. Alternative 4 would not conflict with any land use plan, policy, or regulation. Alternative 4 would require a General Plan Amendment and Zoning Code Amendment/Map Change Upon approval, the Project Site would be able to accommodate Alternative 4.
Mineral Resources	No Impact	**Avoid**. Existing conditions would remain the same under Alternative 1. Therefore, there would be impact to mineral resources.	**Similar**. Because there are no mineral resources on site, implementation of this Alternative would not result in the loss of mineral resources. No impacts would occur.	**Similar**. Because there are no mineral resources on site, implementation of this Alternative would not result in the loss of mineral resources. No impacts would occur.	**Similar**. Because there are no mineral resources on site, implementation of this Alternative would not result in the loss of mineral resources. No impacts would occur.
Noise	Less than Significant with Mitigation	**Avoid**. Existing conditions would remain	**Less**. Noise from construction activities	**Less**. Noise from construction activities	**Less**. Noise from construction activities

Environmental Issue Area	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
		the same under Alternative 1. Therefore, there would be no impacts.	would be similar to the Project. Operational noise would be less than the Project, because the Alternative results in a smaller population and fewer vehicle trips. Impacts would be less than significant.	would be less to the Project due no pool and less equipment utilized. Operational noise would be less than the Project, because this Alternative would include a smaller population and fewer vehicle trips Impacts would be less than significant.	would be less to the Project due no pool and less equipment utilized. Operational noise would be less than the Project, because this Alternative would include a smaller population and fewer vehicle trips Impacts would be less than significant.
Population and Housing	Less than Significant	**Avoid**. Existing conditions would remain the same and would not introduce population or housing growth in the city. Therefore, there would be no impacts. .	**Similar**. Alternative 2 would introduce a new population to the City. However, there would not be substantial unplanned population growth in the city. Impacts would be less than significant.	**Similar**. Alternative 3 would introduce a new population to the City. However, there would not be substantial unplanned population growth in the city. Impacts would be less than significant.	**Similar**. Alternative 4 would introduce a new population to the City. However, there would not be substantial unplanned population growth in the city. Impacts would be less than significant.
Public Services	Less than Significant impact	**Avoid**. Existing conditions would remain the same; therefore, would not result in the need for new public service facilities. There would be no impact.	**Similar**. Alternative 2 would repurpose the existing structure; however, it would not result in the need for new public service facilities. Impacts would be less than significant.	**Similar.** Alternative 3 would repurpose the existing structure; however, it would not result in the need for new public service facilities. Impacts would be less than significant.	**Similar**. Alternative 4 would. repurpose the existing structure; however, it would not result in the need for new public service facilities. Impacts would be less than significant.
Recreation	Less than Significant impact	**Avoid**. Existing conditions would remain the same and would not increase the use of existing parks or other recreational facilities. No impacts would occur.	**Similar**. Alternative 2 would repurpose the existing structure and would provide recreational space and amenities which would not increase the demand for existing neighborhood and regional parks. Impacts would be less than significant.	**Similar**. Alternative 3 would repurpose the existing structure and would provide recreational space and amenities which would not increase the demand for existing neighborhood and regional parks. Impacts would be less than significant.	**Similar**. Alternative 4 would repurpose the existing structure and would provide recreational space and amenities which would not increase the demand for existing neighborhood and regional parks. Impacts would be less than significant.

Environmental Issue Area	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
Transportation	Less than Significant impact.	**Avoid**. Existing conditions would not introduce increased traffic. Therefore, no impacts would occur.	**Less**. Alternative 2 would have a lower population; therefore, VMT would be reduced. Impacts would less than the Project and Impacts would be less than significant.	**Less.** Alternative 3 would have a lower population; therefore, VMT would be reduced. Impacts would less than the Project and Impacts would be less than significant.	**Less.** Alternative 4 would have a lower population; therefore, VMT would be reduced. Impacts would less than the Project and Impacts would be less than significant.
Tribal Cultural Resources	Less than Significant Impact with Mitigation	**Avoid**. Existing conditions would not cause an adverse change in tribal cultural resources. Therefore, no impacts would occur.	**Similar**. Alternative 2 would require tribal consultation and the presence of a Native American monitor during construction. Therefore, impacts would be similar and less than significant with mitigation.	**Similar**. Alternative 3 would require tribal consultation and the presence of a Native American monitor during construction. Therefore, impacts would be similar and less than significant with mitigation.	**Similar**. Alternative 4 would require tribal consultation and the presence of a Native American monitor during construction. Therefore, impacts would be similar and less than significant with mitigation.
Utilities and Service Systems	Less than Significant Impact	**Avoid**. Existing conditions would remain the same. Therefore, there would be no impact.	**Similar**. Alternative 2 would not result in the relocation or construction of new utilities and service systems. The Project would largely take advantage of existing infrastructure with utilities improvements limited to the Project site. Therefore, impacts would be less than significant.	**Similar.** Alternative 3 would not result in the relocation or construction of new utilities and service systems. The Project would largely take advantage of existing infrastructure with utilities improvements limited to the Project site. Therefore, impacts would be less than significant.	**Similar**. Alternative 4 would not result in the relocation or construction of new utilities and service systems. The Project would largely take advantage of existing infrastructure with utilities improvements limited to the Project site. Therefore, impacts would be less than significant.
Wildfire	No Impact	**Avoid**. The Project Site is not located in or near an SRA and does not contain lands classified as VHFHSZs. Therefore, no impact would occur.	**Similar.** The Project site is not located in or near an SRA and does not contain lands classified as VHFHSZs. During both construction and operation, Alternative 2 would be required to maintain adequate emergency access for	**Similar**. The Project site is not located in or near an SRA and does not contain lands classified as VHFHSZs. During both construction and operation, Alternative 3 would be required to maintain adequate emergency access for	**Similar.** The Project site is not located in or near an SRA and does not contain lands classified as VHFHSZs. During both construction and operation, Alternative 4 would be required to maintain adequate emergency access for

Environmental Issue Area	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
			emergency vehicles as required by the City of Long Beach and the Long Beach Fire Department. Therefore, no impact would occur.	emergency vehicles as required by the City of Long Beach and the Long Beach Fire Department. Therefore, no impact would	emergency vehicles as required by the City of Long Beach and the Long Beach Fire Department. Therefore, no impact would occur.

1. Introduction

1.1 Overview of the Project

The Project Site is in the eastern part of the City of Long Beach (City) located at 5150 Pacific Coast Highway. The Project will include the adaptive reuse of a seven-story office building with three levels of subterranean parking in the City of Long Beach, California. The Project would adaptively reuse the entire existing building into a private dormitory (housing for students). A detailed project description is provided in **Section 2, Project Description**.

1.2 Purpose of the Environmental Impact Report (EIR)

The Project is subject to the discretionary approval of the City of Long Beach. Therefore, in accordance with Sections 15050 and 15367 of the CEQA Guidelines, the City has prepared this environmental impact report (EIR) to evaluate the potential environmental impacts of the Project. Under Section 21067 of CEQA, the City is responsible for processing and approving the Project. Accordingly, the City will consider the information in this EIR, along with other information that may be presented during the CEQA process. The EIR will also be used in connection with other permits and approvals necessary for the construction and operation of the Project. The City's Planning Division, as well as the Building Safety Division, Public Works Department, and other responsible public agencies will use this EIR in approving activities associated with the Project.

In accordance with CEQA Guidelines Section 15121, this EIR is an information document that will inform public agency decision-makers and the public generally of the environmental effects associated with the Project, and ways to minimize any significant environmental impacts through mitigation measures or reasonable alternatives to the Project. For some effects, significant environmental impacts cannot be mitigated to a level considered less than significant, in such cases impacts are considered significant and unavoidable.

1.3 Environmental Review Process

In compliance with the CEQA Guidelines, the City has taken steps to provide opportunities for participation in the environmental review process. This includes undertaking a formal scoping process. The following sections describe the scoping process in greater detail.

1.4 Scoping Process

As part of the preparation of the EIR, an effort was made to contact State, regional, and local government agencies and interested parties to solicit comments and inform the public of the Project. This included the distribution of a Notice of Preparation (NOP) and an Initial Study and a public scoping meeting.

1.4.1 Notice of Preparation and Initial Study

Pursuant to Section 15082 of the CEQA Guidelines, the City circulated an NOP and Initial Study for the EIR to State, regional, and local agencies, and members of the public for a 30-day public review period. The public review period began Monday, August 12, 2024, and concluded Friday, September 13, 2024. The purpose of the NOP and Initial Study was to formally notice that the City was preparing an EIR for the Project, and to solicit input regarding the scope and content of

the environmental information to be included in the EIR. The Initial Study limited the focus of the EIR to those environmental factors that cannot be determined to be "Less than Significant" in the EIR and scoped out environmental factors that were determined to be "Less than Significant" and "No Impact".

A copy of the NOP and Initial Study is provided in **Appendix A, Public Involvement**.

1.4.2 Scoping Meeting

The NOP included notice of an EIR Scoping Meeting. The purpose of the EIR Scoping Meeting was for the City to solicit input and verbal and written comments from agencies and the public on environmental issues or alternatives they believe should be addressed in the EIR. The EIR Scoping Meeting was held virtually on Wednesday, August 21, 2024, between 5:00 p.m. and 6:00 p.m. using the Zoom video communications platform. A presentation explaining the Project was provided and attendees were given an opportunity to provide their comments on the scope of the EIR. Two members of the public attended the EIR Scoping Meeting. No comments were received from meeting participants during the scoping meeting.

Three written comment letters were received during the scoping period which began on Monday, August 12, 2024, and concluded Friday, September 13, 2024. The presentation from the EIR Scoping Meeting and written comments received during the scoping period are provided in **Appendix A, Public Involvement**

1.5 Organization of the EIR

Executive Summary. The Executive Summary provides an overview of the EIR. It briefly describes the Project (location and key Project features), the CEQA environmental review process, a summary of Project impacts, a summary of the Project alternatives, and applicable mitigation measures.

Chapter 1. Introduction. This chapter provides a summary of the Project, discusses the purpose of the EIR, including CEQA compliance requirements, and steps undertaken in the CEQA process, including the scoping process.

Chapter 2. Project Description. This chapter describes the Project, including the Project location, surrounding land uses, existing conditions, Project objectives, Project use options, and the intended uses of the EIR.

Chapter 3. Environmental Setting. This chapter presents an overview of the Project's environmental setting, including the regional setting, project site setting, and past, present, and probable future projects considered in the analysis of potential Project contributions to cumulative impacts.

Chapter 4. Environmental Impact Analysis. This chapter describes the potential environmental effects of the Project. The discussion is focused on potential impacts to 20 environmental resource topics. This includes discussion of the regulatory and environmental settings, methodology employed in the analysis, the thresholds of significance used to determine impacts, level of impact, mitigation measures, if warranted, and level of significance of the impact after mitigation. The EIR addresses potential impacts to these environmental issues:

- Air Quality
- Cultural Resources
- Energy
- Geology and Soils

- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

Chapter 5. Alternatives. This chapter describes a reasonable range of alternatives to the Project. These alternatives include Alternative 1: No Build/No Project, Alternative 2: Market Rate Housing, Alternative 3: Senior and Student Housing, Alternative 4: Student Housing and Office Space. Chapter 5 presents an analysis of the environmental effects of the alternatives for each issue area, though not to the same level of detail as analyzed for the Project.

Chapter 6. Other CEQA Considerations. This chapter includes a discussion of other issues required by CEQA that are not discussed in other sections of the EIR.

Chapter 7. List of Preparers. This chapter includes a list of the persons responsible for preparation of the EIR.

Chapter 8. References. This chapter includes bibliography of resources used in preparation of the EIR.

Appendices

The Environmental Analyses in this EIR are supported by the following appendices:

Appendix A – Public Involvement

Appendix B - Park Tower Student Housing Air Quality and Greenhouse Gas Emissions Analysis

Appendix C - Cultural Resources Assessment

Appendix D - Park Tower Student Housing Energy Analysis

Appendix E - Phase I Environmental Site Assessment (ESA)

Appendix F - Hydrology Study

Appendix G - Park Tower Student Housing Noise Analysis

Appendix H – Trip Generation Analysis and Vehicle Miles Traveled Screening

Appendix I – AB 52 Tribal Consultation

Appendix J - Utility Memorandum

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2. Project Description

This section of the EIR describes the Project, including the Project overview, Project location, existing conditions, Project objectives, description of the Project, and required approvals needed for implementation of the Project.

2.1 Project Proponent

Derek Burnham
Burnham Development
111 W Ocean Blvd, STE 1625
Long Beach, CA 90802

2.2 Lead Agency Contact Person

Consistent with CEQA Guidelines Section 15050, the City of Long Beach is the Lead Agency under CEQA and is responsible for adoption of the environmental document and approval of the project.

Gina Casillas, Planner
Long Beach Community Development Department, Planning Bureau
411 West Ocean Boulevard, 3rd Floor
Long Beach, California 90802
LBDS-EIR-Comments@longbeach.gov

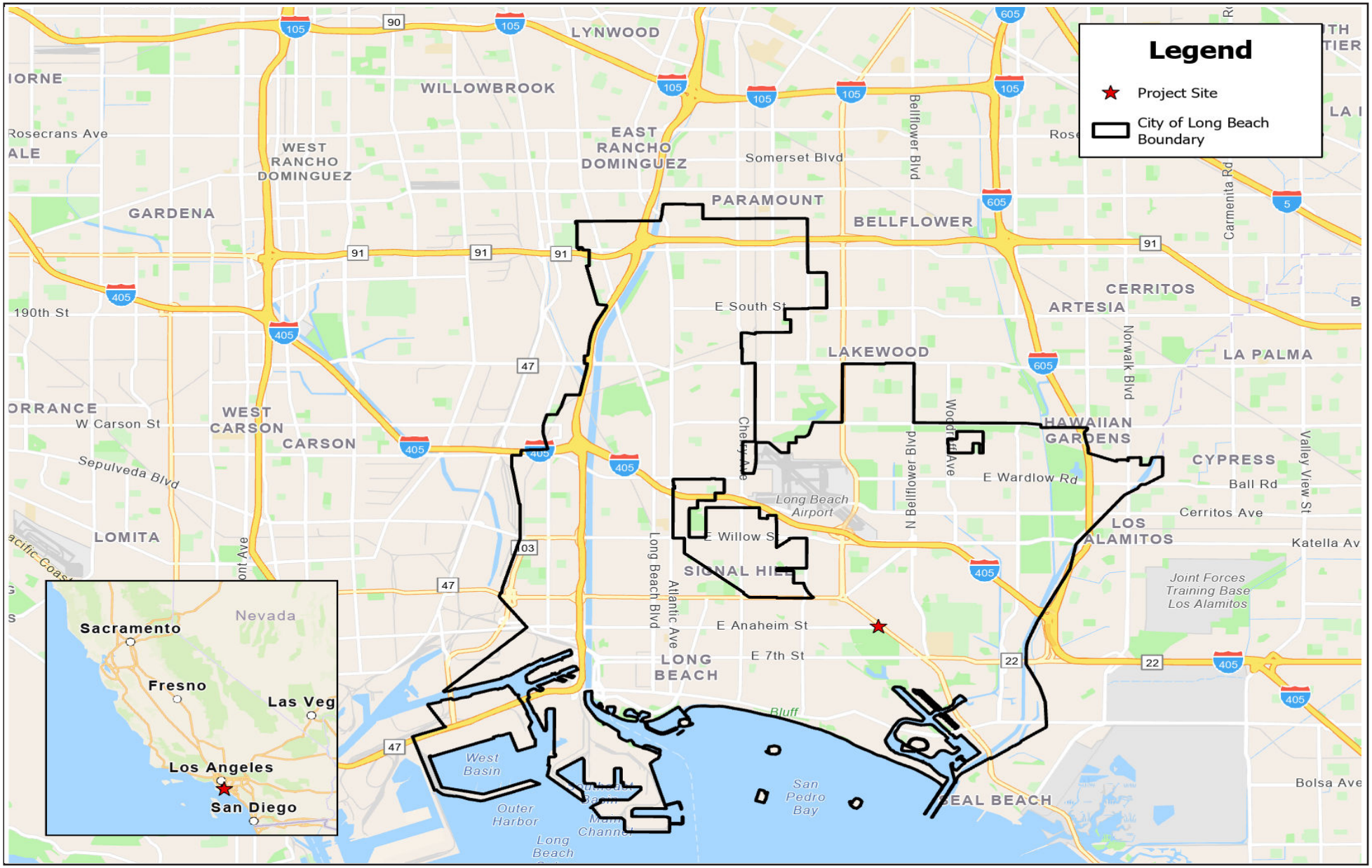
2.3 Project Overview

The Project will adaptively reuse an existing seven-story office building with three levels of subterranean parking located at 5150 Pacific Coast Highway in the City of Long Beach (City), California. The existing office building is approximately 120,000 square feet (sf), of which 109,600 sf is currently leased. The Project would involve the adaptive reuse of the existing building into a private dormitory (housing for students) with 149 student residential suites (593 beds)[1].

2.4 Project Location and Surrounding Uses

The Project Site is in the eastern part of the City located at 5150 Pacific Coast Highway. The City lies within southeast Los Angeles County and is approximately 20 miles south of downtown Los Angeles. The City borders the Pacific Ocean to the south; the cities of Carson and Los Angeles to the west; the cities of Compton, Paramount, and Bellflower to the north; the cities of Lakewood, Hawaiian Gardens, and unincorporated Orange County to the east. The Los Angeles river is approximately 4.12 miles west of the Project Site. **Figure 2-1, Regional Vicinity Location Map** depicts the Project Site in a regional context.

[1] Section 21.15.590 of Long Beach Municipal Code: "Communal housing" means housing for nonfamily groups with common kitchen and dining facilities but without medical, psychiatric or other care. Communal housing includes boarding house, lodging house, dormitory, fraternity house, commune, and religious home. Communal housing does not include handicapped or senior citizen housing, residential care facility, or convalescent hospital or parsonage.



SOURCE: Arc GIS, 2024

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FIGURE 2-1: Regional Vicinity Location Map

PARK TOWER STUDENT HOUSING PROJECT

Kimley»Horn

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The Project Site is located on a 51,048 square feet (sf) (1.2 acres) triangular shaped parcel currently developed with a seven-story office building and three levels of subterranean parking built in 1981. The existing office building is approximately 120,000 sf of which 109,600 sf is currently leased (as of January 2024). The Project Site is bounded by the Pacific Coast Highway to the north and east, East Anaheim Street to the south, and Clark Avenue to the west. The Project Site is surrounded by commercial, office, residential, and religious uses to the north and east past the Pacific Coast Highway; a recreational golf course (Recreational Park Golf Course18) to the south; and commercial and residential uses to the west. Also, the CSULB Beachside College Student housing center and living facility is located further to the north. **Figure 2-2, Local Vicinity and Surrounding Land Uses Map**, depicts the Project Site in a local setting. The Pacific Coast Highway and the San Diego Freeway (I-405) located 1.4 miles north of the Project Site provides regional access.

Long Beach Transit (LBT) has multiple stops that travel along the Project Site frontages, including Line 41, 45, and 46 which travels west/east along East Anaheim Street. These LBT routes provide service to the Los Angeles County Metropolitan Transportation Authority (Metro) Downtown Long Beach Station 3.57 miles southwest. Additional LBT stops for Lines 171 and 175 are provided 250 feet east of the Project Site. Various other LBT Lines, including Lines 91, 111, 112, 121, and 173, are located within 0.5 miles of the Project Site

2.5 Existing Conditions

The Project Site is currently developed and highly disturbed. The Project Site is currently developed with a seven-story office building and three levels of subterranean parking. The existing office building is approximately 120,000 sf, of which 109,600 sf is currently leased (as of January 2024). The western side of the Project Site adjacent to Clark Avenue includes a surface parking lot, driveway, and landscaping. In addition to the existing building and small surface parking lot on the ground level, there is a mix of ornamental landscaping on the Project Site, including a tree along Clark Avenue. On the western side of the Project Site, there is a sparsely landscaped open space area. There are four street trees along the Pacific Coast Highway. There is signage for the existing office building on the northern corner of the Project Site along Pacific Coast Highway.

Table 2-1: Project Site and Surrounding Uses summarizes the on-site and surrounding land uses.

Table 2-1: Project Site and Surrounding Land Uses

Description	Existing Land Use	Zoning[1]
Project Site	Office	Community Commercial Automobile-Oriented (CCA) District
North	Pacific Coast Highway; Commercial; Residential	CCA District; Moderate-density Multiple Residential (R-4-R); Moderate-density Multiple Residential (R-4-R (HL-25)); Overlay: HL-25
South	East Anaheim Street; Recreation	Park (P)

East	Commercial; Religious; Offices; Senior Services; Institutional	CCA District; Neighborhood Pedestrian-Oriented Commercial (CNP) District; P District
West	Clark Avenue; Residential; Commercial	R-4-R District, Two-family Residential, standard lot (R-2-N) District, Neighborhood Commercial and Residential (CNR) District.
Notes: 1. City of Long Beach. City of Long Beach Map It. Available at https://gis.longbeach.gov/mapit/. Accessed March 21, 2024.		

2.6 General Plan Land Use and Zoning

2.6.1 General Plan Land Use and Zoning

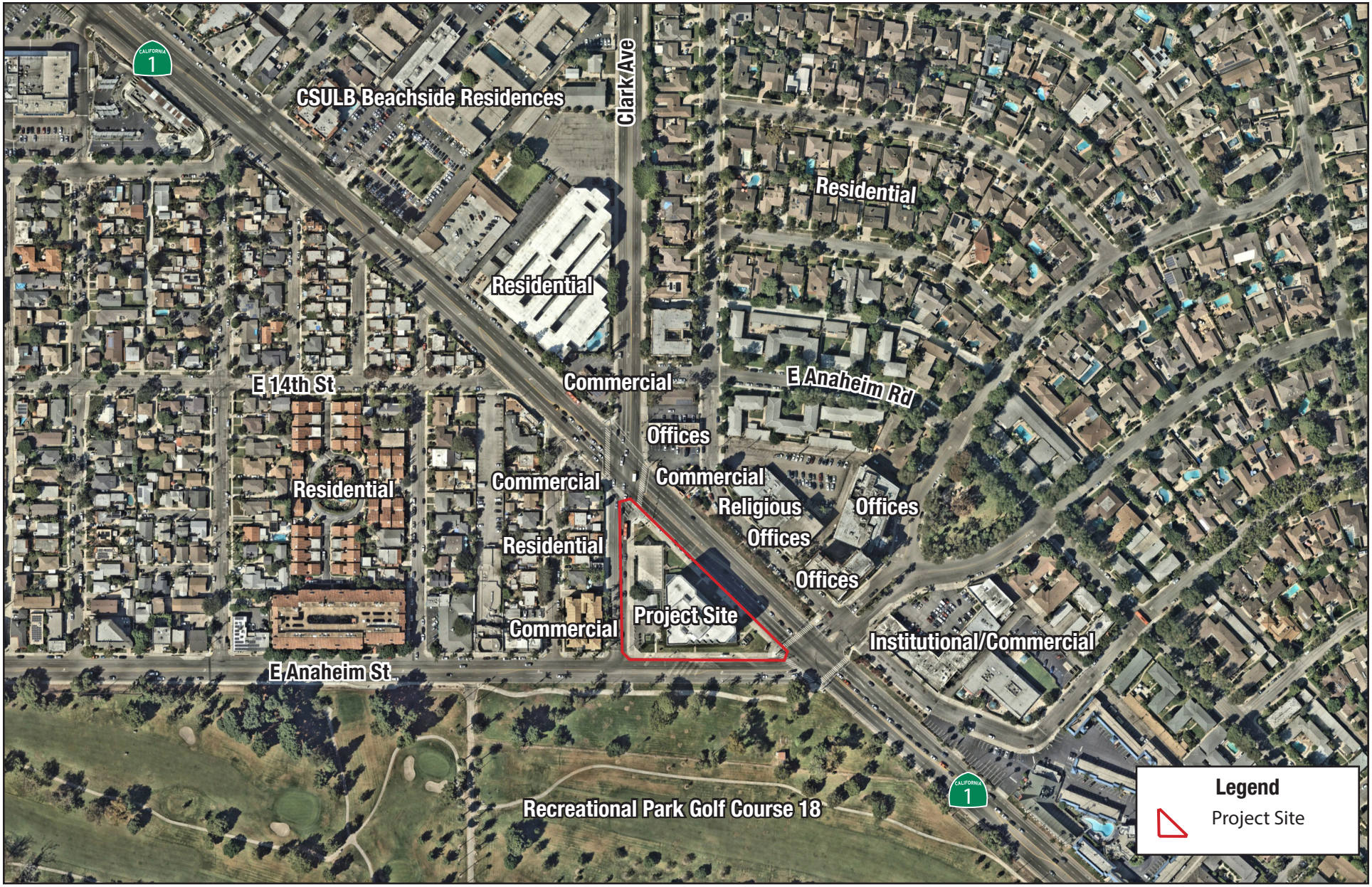
Figure 2-3, General Plan Land Use Map, depicts the general plan Placetype for the Project Site and surrounding area.

Per the General Plan, the Project Site's Placetype is CC, Community Commercial.[2] The Community Commercial Placetype is intended to serve automobile oriented commercial needs. Residential uses are not allowed under this Placetype. A FAR of between 2.0 and 4.0 is allowed in areas designated for Community Commercial. The maximum building height for areas designated for Community Commercial is seven stories but varies based on location in the City. The General Plan Land Use map identifies the maximum building height at the Project Site as five stories.

Figure 2-4, Zoning Map depicts that the Project Site is in the Community Commercial Automobile-Oriented (CCA) Zoning District. Pursuant to Long Beach Municipal Code (LBMC) Section 21.32.020, the CCA Zoning District permits retail and service uses for an entire community including convenience and comparison shopping for goods and associated services.

The Project is proposing a General Plan Amendment from the current Community Commercial (CC) Placetype to the Neighborhood Serving Center (NSC-Moderate) Placetype, which would permit residential uses. The Project would also require a Zoning Code Amendment/Map Change to change the existing zone from Community Commercial Automobile Oriented (CCA) to Mixed-Use (MU-3) to allow for the Project's student dormitory residential uses and to enable the Project to take advantage of the adaptive reuse development standards. The Project would also require the approval of a Conditional Use Permit (CUP) to allow the "Special Group Residence" and Site Plan review of adaptive reuse.

[2] City of Long Beach, *City of Long Beach General Plan 2040*, Land Use Element, December 2019.



SOURCE: Nearmap, 2023

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FIGURE 2-2: Local Vicinity and Surrounding Land Uses Map

PARK TOWER STUDENT HOUSING PROJECT

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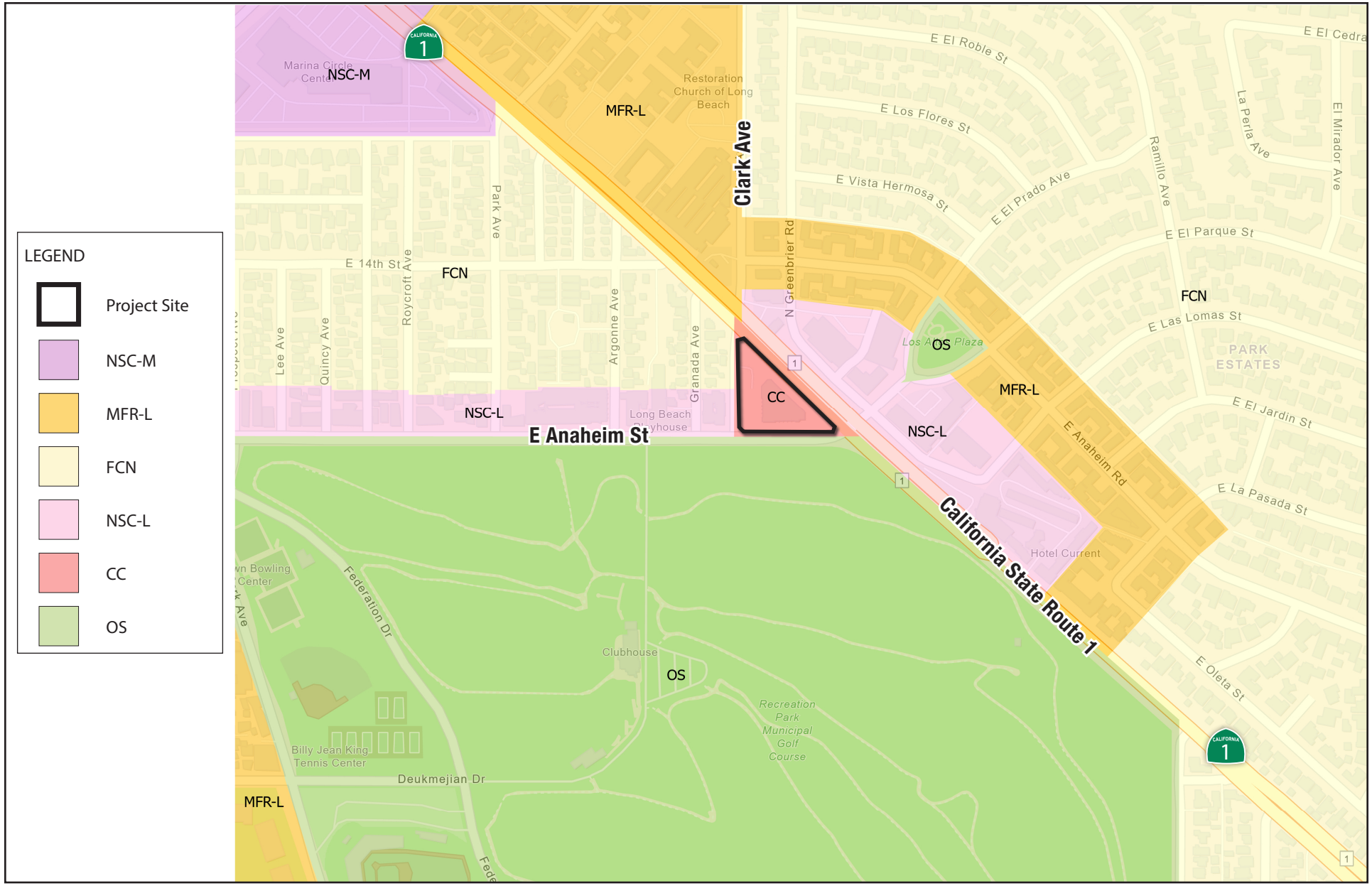

SOURCE: ArcGIS Pro, 2024

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FIGURE 2-3: General Plan Land Use Map

PARK TOWER STUDENT HOUSING PROJECT

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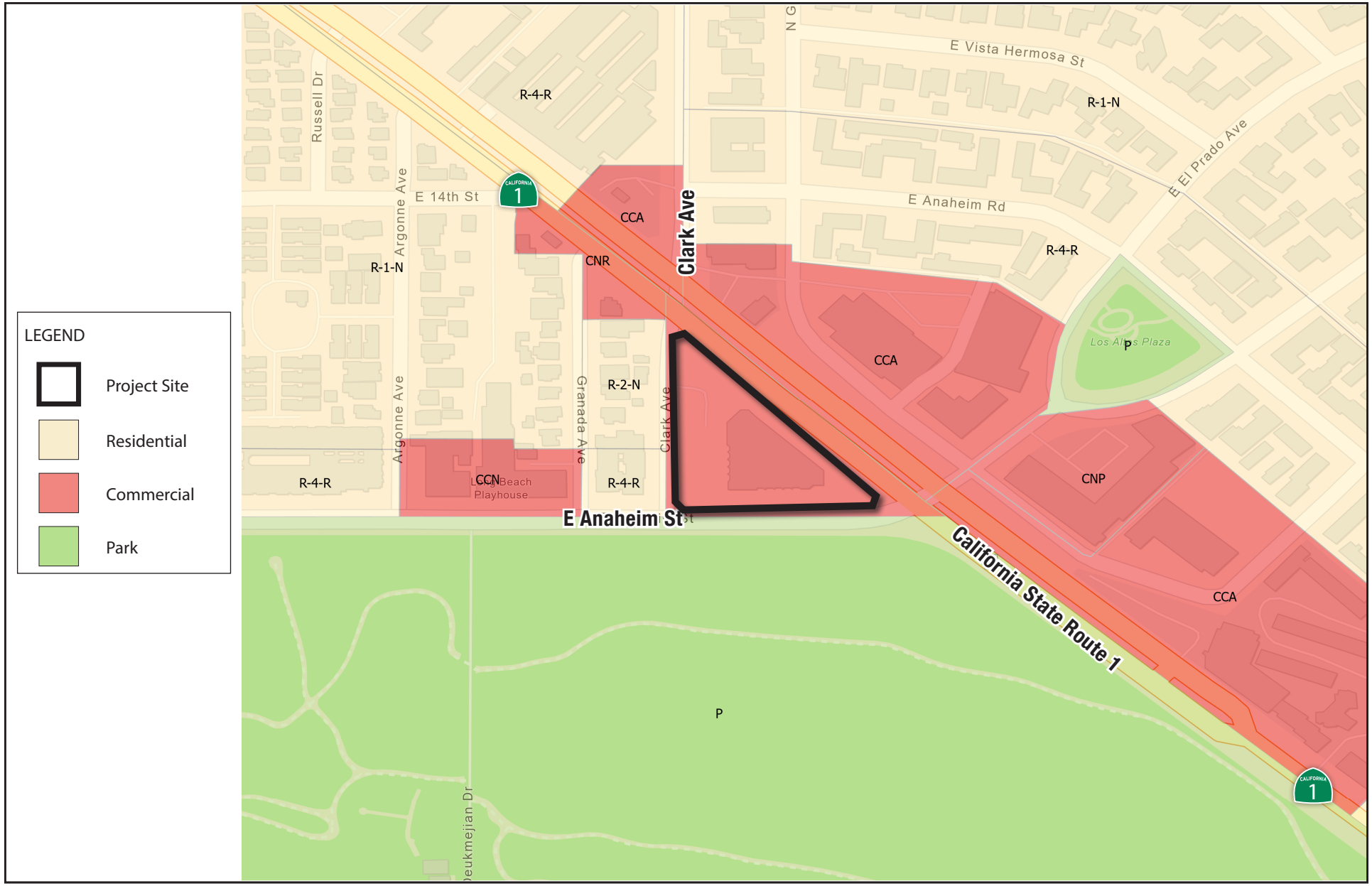

SOURCE: ArcGIS Pro, 2024

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FIGURE 2-4: Zoning Map

PARK TOWER STUDENT HOUSING PROJECT

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2.7 Statement of Project Objectives

The underlying purpose and primary objective of the Project is to adaptively reuse an existing office building and transform it into private student housing. The Project would include campus style residential suites and private open space and other amenities. As further required by the CEQA Guidelines, the specific objectives of the Project are provided below:

The objectives of the Project are:

- Fulfill the city's housing goals by expanding student housing opportunities in proximity to open space, public transportation, and a wide range of services and goods.
- Promote sustainable development through the adaptive reuse of an existing seven-story office building into a 593-bed student housing development that includes supportive uses and amenities that promote interaction and communication between students such as large lounge areas and active outdoor recreational areas.
- Promote pedestrian and bicycle safety and access to the Project Site by engaging with the existing dedicated bike throughfare along Pacific Coast Highway with bicycle parking and lockers on the subterranean parking level 1.
- Increase access to alternative transportation options on the Project Site including zip cars and electric scooters. Increase accessibility to the Project Site through a dedicated ride share pick-up and drop-off locations along East Anaheim Street.
- Provide a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design, including light materiality, landscape features, and active ground floor uses with open space amenities.
- Provide safe student housing through terraced landscape buffers and a security fence and gate.
- Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions through such features as a PV solar panel array, electric vehicle charging stations, energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping.

2.8 Description of the Project

2.8.1 Project Land Uses

The Project is depicted on **Figure 2-5, Conceptual Site Plan**. The first level of the Project would consist of administrative/management offices and various amenities including a lobby, mail room, kitchen and dining area, study room, laundry facilities, fitness area, and a men and women's locker room. The 149 student residential suites (593 beds) would be located on the second to seventh floor. The Project would include 12 one-person suites, 2 two-person suites, 7 three-person suites, 96 four-person suites, 20 five-person suites, and 12 six-person suites, totaling approximately 73,486 sf of residential area. The Project would construct a new 728 sf pavilion building that is designed to activate the street front along Clark Avenue (See **Figure 2-6, Preliminary Massing Concept**). See further details under Section 2.8.2, Design.

The Project would utilize the three levels of existing subterranean vehicular parking and would include a total of 364 parking stalls (218 standard spaces, 19 accessible spaces, 127 tandem spaces). The Project would also include 150 bicycle parking spaces on the first level of subterranean parking. The Project would include minimal amounts of excavation necessary for pool construction and the installation of utilities to the building.

The Project would incorporate new accessible at-grade open space as well as indoor and outdoor common and private open space for Project residents and guests. The Project would provide an approximately 22,523 sf of open space that would include student plaza, benches, lounging areas, pool, patio, outdoor BBQs and picnic tables, lawn area, shade structure, planters, and landscaping. Open space areas on the ground floor would be accessed from the entrance of Pacific Coast Highway, East Anaheim Street, Clark Avenue, as well as from the interior of the Project Site from the ground -floor parking level or via subterranean parking exit stairs.

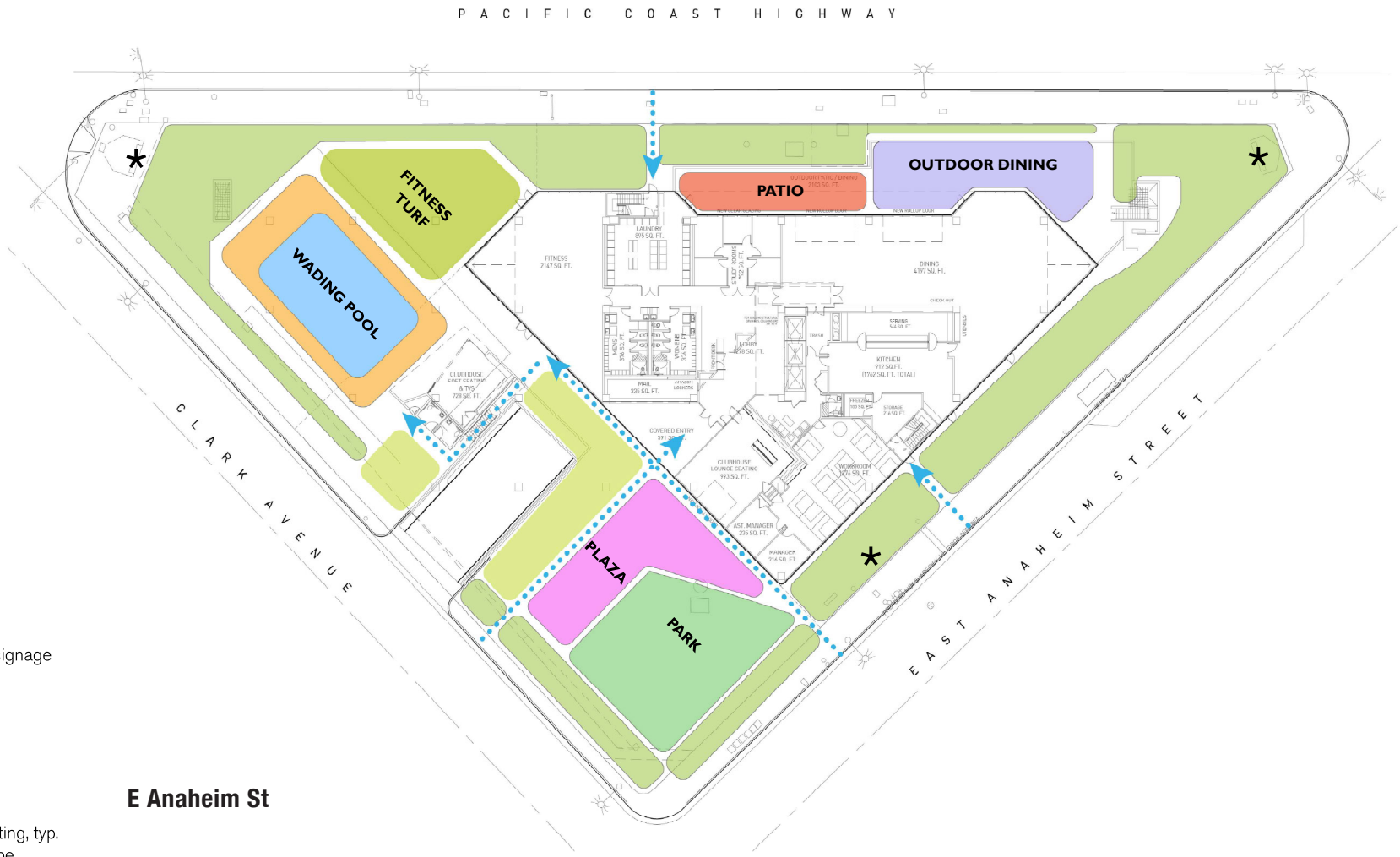
2.8.2 Design

The Project would largely maintain the exterior of the existing building. Minor visual improvements would include the addition of decorative window films, identification signage, improvements to the ground level entryway and the addition of a new 728 sf pavilion building adjacent to the vehicular ramp off of Clark. The pavilion would include folding walls and roof which would mimic the ground floor architecture of the existing building.

Adjacent to the existing building, the existing surface parking, walkways, and landscaping would be removed and would be replaced by new outdoor amenities.

A security fence and gate would be provided around the perimeter of the Project Site. Project design would also include lighting of entryways, publicly accessible areas, parking areas, and common building and open space residential areas for security purposes.

PROGRAM BUBBLE DIAGRAM



Keynotes

- Entry
- Focal feature/signage
- Lounge Area
- Wading Pool
- Fitness Turf
- Patio
- Outdoor Dining
- Plaza
- Park
- Enhanced planting, typ.
- Buffer landscape

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FIGURE 2-5: Conceptual Site Plan

PARK TOWER STUDENT HOUSING PROJECT

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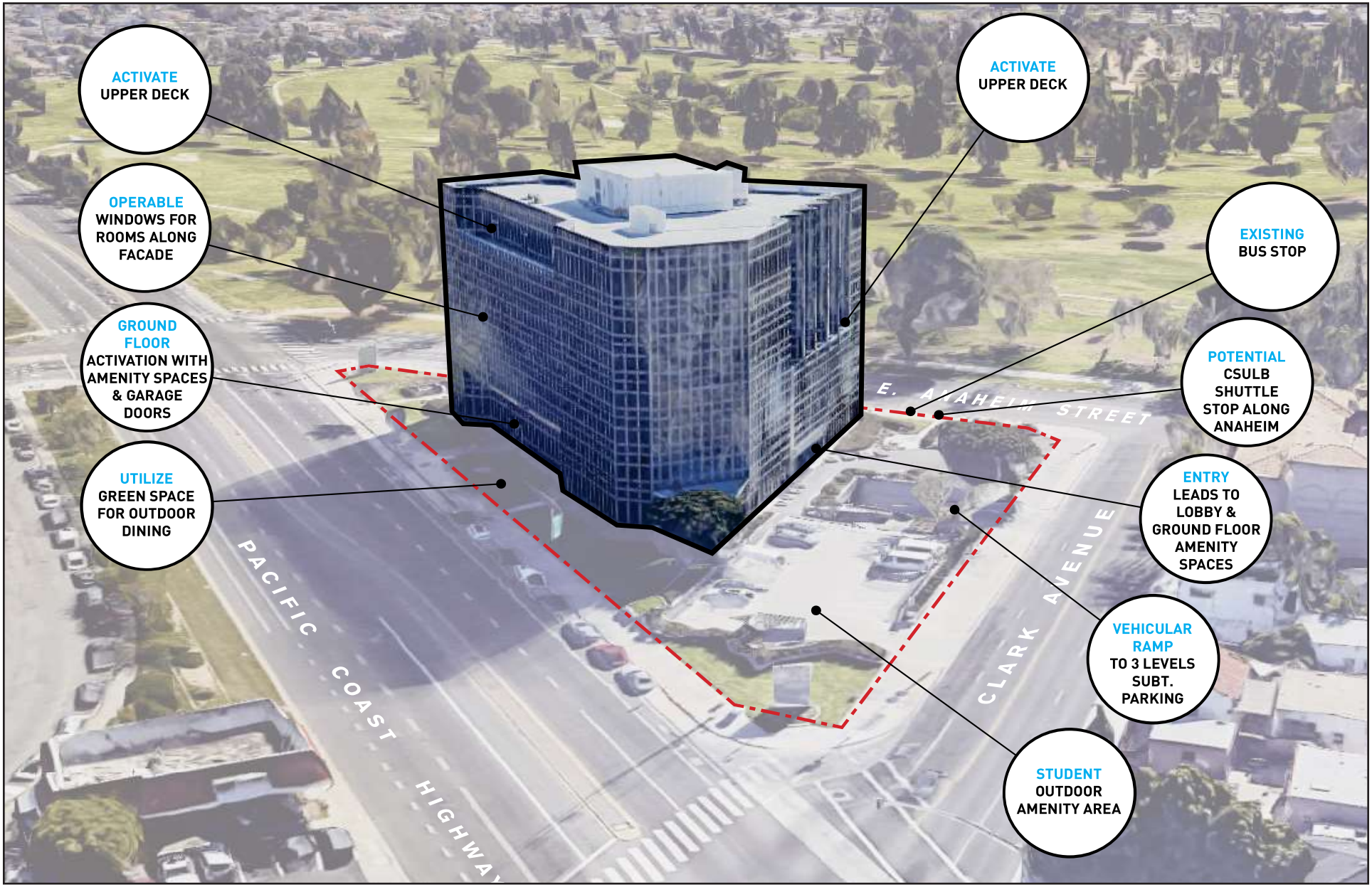

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FIGURE 2-6: Preliminary Massing Concept

PARK TOWER STUDENT HOUSING PROJECT

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2.8.3 Open Space and Landscaping

Open space and landscaping would be provided in accordance with the LBMC. The Project would incorporate accessible at-grade open space as well as indoor and outdoor common and private open space for Project residents and guests (see **Figure 2-7, Preliminary Landscaping and Amenities Plan**). The Project would provide approximately 22,523 sf of open space that would include the aforementioned, student plaza, lawn area, fitness turf, patio, and upper decks. The outdoor open space would include various amenities including benches, lounging areas, pool, pool lounge, picnic tables, shade structures, and landscaping. Open space areas on the ground floor would be accessed from the entrance of Pacific Coast Highway, East Anaheim Street, Clark Avenue, as well as from the interior of the Project Site from the ground-floor parking level or via subterranean parking exit stairs. Landscaping for the Project would be consistent with LBMC Chapter 21.42, Landscaping Standards.

2.8.4 Vehicular Access, Circulation, and Parking

Vehicular Access Circulation

There is currently one driveway located on Clark Avenue. The Project would maintain the existing driveway for residents and guests of the Project. The driveway would lead to three floors of subterranean parking. The Project would also include a proposed rideshare pick-up and drop-off area on East Anaheim Street.

Pedestrian and Bicycle Circulation

Pedestrian access is provided via sidewalks located along Pacific Coast Highway, East Anaheim Street, and Clark Avenue. Bicycle access is provided by bicycle paths on Pacific Coast Highway.

Vehicle Parking

The City's parking regulations, found in LBMC Chapter 21.41, identify the required number of parking spaces for particular land uses. Special residential uses, such as a dormitory would require 1 parking space per bed. However, the Project would be subject to Assembly Bill (AB) 2097 parking requirements, which would not enforce minimum parking requirements on a residential project if the project is located within one-half mile of public transit.[3] The Project would be located within one-half mile of public transit options including Long Beach Transit (LBT) bus service and therefore be subject to AB 2097. Therefore, the Project would provide 0.61 spaces per bed, which would result in 364 vehicle parking stalls. According to the 2022 Edition of the California Green Building Standards Code (CALGreen Code) Section 4.106.4.2.2, multifamily development projects with 20 or more dwelling units should have ten percent of the total number of parking spaces be electric vehicle (EV) charging spaces capable of supporting future Level 2 electric vehicle supply equipment (EVSE), twenty-five percent of the total number of parking spaces shall be EV ready, and five percent of the total number of parking spaces shall be equipped with EV charging stations (EVCS).[4]

The Project would comply with CALGreen Code and provide ten percent of the total number of parking spaces ten percent of the total number of parking spaces EV charging spaces capable of supporting future Level 2 EVSE, twenty-five percent of the total number of parking spaces shall be EV ready, and five percent of the total number of parking spaces shall be equipped with EVCS.

[3] AB 2097 Residential, commercial, or other development types: parking requirements.
[4] 2022 California Green Building Standards Code. Chapter 4 Residential Mandatory Measures. Available at https://codes.iccsafe.org/content/CAGBC2022P1/chapter-4-residential-mandatory-measures. Accessed April 1, 2024.

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OVERALL CONCEPT SITE PLAN

Keynotes

1. Security fence and gate
2. Student plaza
3. Built-in bench/seating
4. Outdoor BBQ with picnic tables
5. Outdoor lounge with firepit
6. Flexible Lawn with artificial turf
7. (E) Bus stop
8. CSULB shuttle pick up
9. Sloped walk
10. Wading pool 63'x27' (1,700 SF)
11. Pool lounge area with pavers
12. Shade structure with daybeds
13. Accessible ramp
14. Fitness turf with equipment
15. Patio
16. Outdoor dining patio
17. (E) Utilities
18. Planted parkway with street trees
19. Raised planter
20. Wall with project signage
21. Plants in pots
22. (E) Tree
23. Outdoor TV integreated into raised planter wall
24. (E) Subterranean parking exit stair
25. Marquee signage
26. Bike racks

Keynotes - Existing

- **A.** Street light
- **B.** Traffic light
- **C.** Street sign
- **D.** Transformer
- **E.** Bus sign
- **F.** City transit
- **G.** Fire hydrant
- **H.** Water
- **I.** Electric
- **J.** Mail
- **K.** Sewage drain
- **L.** Vault
- **M.** Vent

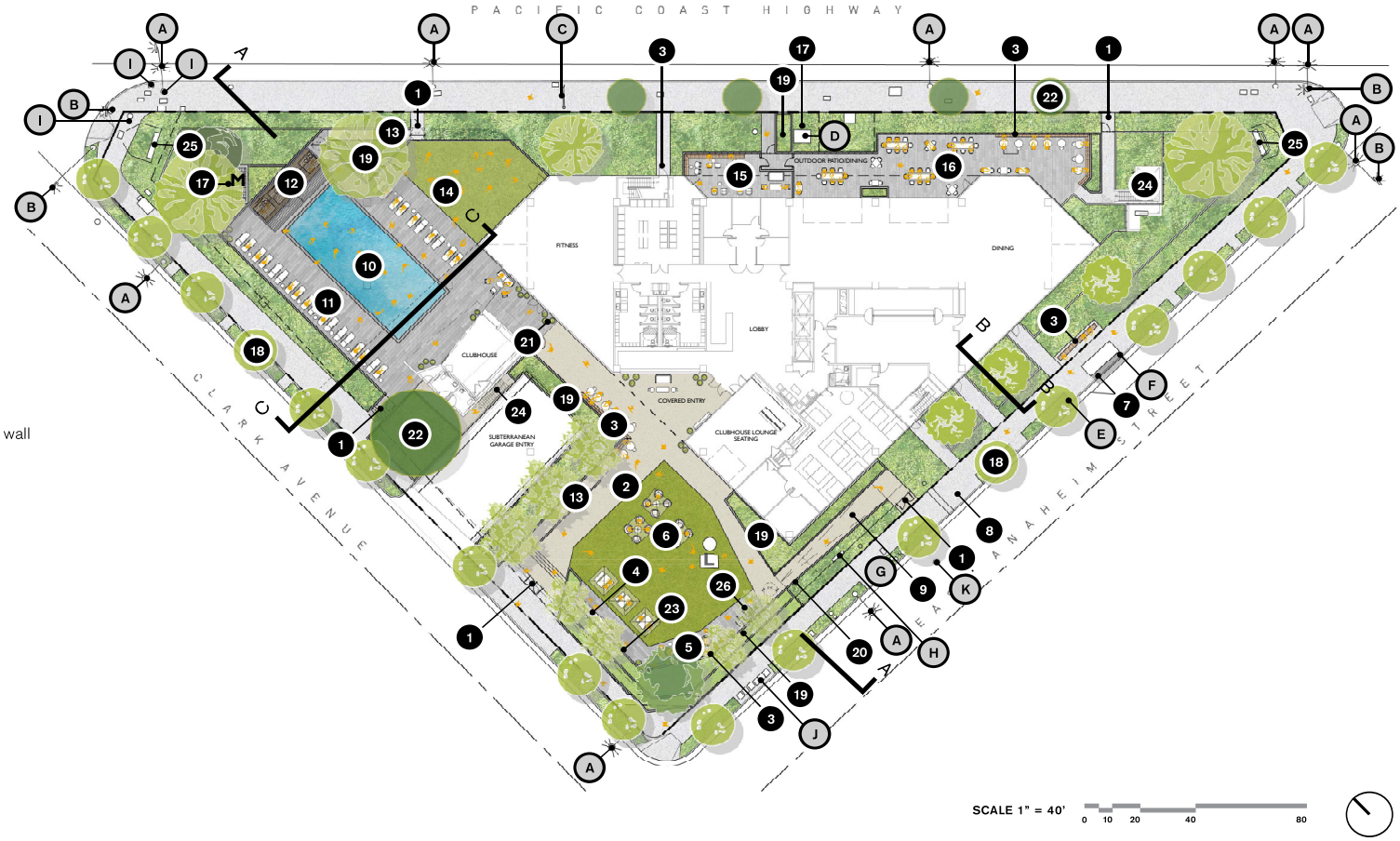

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FIGURE 2-7: Preliminary Landscape and Amenities Plan

PARK TOWER STUDENT HOUSING PROJECT

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2.8.5 Lighting and Signage

The Project would install various exterior lights on and around the new building and within parking areas. Exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses. Building security lighting would be used at all entry and exits and would remain on from dusk to dawn but would be designed to prevent light trespass onto adjacent properties. All exterior lighting would meet applicable City of Long Beach lighting requirements outlined in the Long Beach Municipal Code (LBMC) and General Plan. These regulations include:

- LBMC § 8.26.130 requires that facilities have adequate and effective illumination in all operations and areas, following standards set forth by the Society of Illuminating Engineers to the National Institute for Occupational Safety and Health.
- LBMC § 22.30.110 requires that lighting is consistent with Illuminating Engineering Society of North America (IES) and International Dark Sky Association (IDA) standards to prevent over-lighting, lighting must create usable and safe areas for nighttime pedestrian activities, and buildings must have exterior mounted lighting to illuminate pedestrian paths, parking, and lobbies.

2.8.6 Site Security

During construction, the Project Site would be secured with perimeter fencing and gate. As this is not intended to be a public facility, during Project operations, the building would not be open to the general public. Additional security features may include but not be limited to, the use of security cameras, access control to the building and well-illuminated parking areas designed with a minimum of dead space to eliminate areas of concealment, location of building entrances in high-foot traffic areas.

2.8.7 Utilities and Infrastructure

Electric power would be provided to the Project Site by Southern California Edison (SCE) and supplemented by a PV solar panel array installed on the Project building roof. Water and sewer service would be provided by the Long Beach Utilities Department (formerly known as the Long Beach Water Department). The Project would not use natural gas; however, natural gas service in the area is provided by the City of Long Beach Utility Services. Trash and recycling collection would be provided by City of Long Beach Utility Services.

2.8.5 Construction Schedule/Activities

Project Construction Project construction is anticipated to occur as a single-phase, lasting approximately 15 months, beginning as early as the first quarter of 2025, and ending as early as the first quarter of 2026. For purposes of this environmental analysis, opening year is assumed to be 2026.

2.9 Project Design Features

The Project would incorporate Project Design Features that would help minimize or avoid significant environmental effects. The Project Design Features will be included in the Mitigation Monitoring and Reporting Program required in association with certification of the Draft EIR. **Table 2-2, Summary of Project Design Features**, identifies the project design features incorporated into the Project.

Table 2-2: Summary of Project Design Features

No.	Project Design Feature	Description
1	Rooftop Solar Photovoltaic Panels	The Project Site will be solar ready.
2	LEED Certification	Targeted to achieve LEED Certified level.
3	Water efficient fixtures	The Project would provide water-efficient fixtures.
4	Water efficient landscaping	The Project would provide efficient irrigation system

2.10 Intended Uses of the EIR

In accordance with Sections 15050 and 15367 of the CEQA Guidelines, the City is the Lead Agency for the Project and has principal authority for purposes of CEQA and jurisdiction over project approval. This EIR will be used to provide environmental clearance for the discretionary entitlements, reviews, and approvals required for implementation of the Project including the following:

- General Plan Amendment/Map changing Community Commercial (CC) Land Use District to Land Use Element (LUE) Neighborhood Serving Center or Corridor (NSC-Moderate) Placetype;
- Zoning Code Amendment/Map Change from Community Commercial Automobile-Oriented (CCA) Zoning District to Mixed Use (MU-3) Zoning District;
- Conditional Use Permit for the Special Group Residence use for the dormitory use;
- Site Plan Review for the Adaptive Reuse of the building;
- Building Permits for the change in use of the building;
- Certification of the EIR for the Project;
- A street improvement encroachment permit from Caltrans for activities within the Pacific Coast Highway right-of-way; and
- Other ministerial approvals as needed and as may be required

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3. Environmental Setting

CEQA Guidelines Section 15125 requires that an EIR include a description of the existing environment. This chapter provides a general overview of the environmental setting for the Project, however detailed information on existing conditions for each environmental resource area evaluated in this EIR is provided in **Chapter 4, Environmental Impact Analysis**. This chapter also provides an overview of related projects that are considered in the EIR in evaluating cumulative impacts that could result from the Project together with other projects.

3.1 Regional Setting

Figure 2-1: Regional Vicinity Location Map depicts the Project Site in a regional context. The City is in the southernmost portion of Los Angeles county, approximately 20 miles south of downtown Los Angeles. The City borders the Pacific Ocean to the south, the cities of Carson and Los Angeles to the west, the cities of Compton, Paramount, and Bellflower to the north, the cities of Lakewood, Hawaiian Gardens, and unincorporated Orange County to the east. The Los Angeles River is approximately 4.12 miles west of the site. Primary regional vehicular access is provided by the Pacific Coast Highway and the San Diego Freeway (I-405) located 1.4 miles north of the Project Site.

3.2 Project Site Setting

Figure 2-2: Local Vicinity and Surrounding Land Uses Map, depicts the Project Site and immediate vicinity. The Project Site is located in the eastern part of the City. The Project Site is generally bounded by the Pacific Coast Highway to the north and east, East Anaheim Street to the south, and Clark avenue to the west. The Project Site is surrounded by commercial, office, residential, and religious uses to the north and east past the Pacific Coast Highway; a recreational golf course (Recreational Park Golf Course 18) to the south; and commercial and residential uses to the west.

3.3 Cumulative Development

Section 15355 of the CEQA Guidelines defines “cumulative impacts” as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” This means that while the impacts of projects on their own may be insignificant, when analyzed in combination with impacts from other projects in the vicinity, they may be significant. CEQA Guidelines section 15130 requires EIRs to discuss the cumulative impacts of a project “when the project’s incremental effect is cumulatively considerable.”

Each impact analysis discussion provided in **Chapter 4, Environmental Impact Analysis**, includes a cumulative impacts discussion; however, no Projects were identified within a 1-mile radius of the Project as meeting the City’s criteria of 5,000 SF or greater of new commercial and/or industrial and greater than 10 new dwelling units.

4. Environmental Impact Analysis

4.1 Introduction

This chapter of the EIR discusses the potential environmental effects of the Project. As discussed in **Section 1.5, Organization of the EIR**, the discussion provided in this chapter is arranged by environmental issue analyzed:

- Air Quality
- Cultural Resources
- Energy
- Geology and soils
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

Discussion within each section is established as follows:

Regulatory Setting. The regulatory setting identifies the applicable federal, state, regional, and/or local laws, regulations, and applicable to the Project.

Environmental Setting. The environmental setting discusses existing conditions at the Project Site and in the surrounding area at the time the NOP was published. The purpose of the environmental setting is to describe the "baseline condition" the City of Long Beach will use to compare to the Project for purposes of identifying whether the Project would result in significant impacts.

Impact Analysis. The impact analysis discussion describes the methodology employed to analyze the effects of the Project on each environmental issue. This section also identifies the thresholds of significance employed to determine whether the Project would produce a significant impact. Finally, potential project impacts are discussed per the threshold significance criteria.

4.2 Air Quality

This section of the EIR analyzes potential air quality impacts associated with the construction and operation of the Project. The information in this section is summarized from the detailed air quality analysis, **Park Tower Student Housing Air Quality and Greenhouse Gas Emissions Analysis**, included as **Appendix B**.

4.2.1 Regulatory Setting

Federal

Federal Clean Air Act

Air quality is federally protected by the Federal Clean Air Act (FCAA) and its amendments. Under the FCAA, the U.S. EPA developed the primary and secondary National Ambient Air Quality Standards (NAAQS) for the criteria air pollutants including O_3, NO_2, CO, SO_2, PM10, PM2.5, and lead (Pb). Projects in or near nonattainment areas could be subject to more stringent air-permitting requirements. The FCAA requires each state to prepare a State Implementation Plan to demonstrate how it will attain the NAAQS within the federally imposed deadlines.

The U.S. EPA can withhold certain transportation funds from states that fail to comply with the planning requirements of the FCAA. If a state fails to correct these planning deficiencies within two years of Federal notification, the U.S. EPA is required to develop a federal implementation plan for the identified nonattainment area or areas. The provisions of 40 Code of Federal Regulations (CFR) Parts 51 and 93 apply in all nonattainment and maintenance areas for transportation-related criteria pollutants for which the area is designated nonattainment or has a maintenance plan. The U.S. EPA has designated enforcement of air pollution control regulations to the individual states. Applicable federal standards are summarized in **Table 4.2-1: State and National Ambient Air Quality Standards**.

State

California Air Resources Board

California Air Resources Board (CARB) administers the air quality policy in California. The California Ambient Air Quality Standards (CAAQS) were established in 1969 pursuant to the Mulford-Carrell Act. The CAAQS, included with the NAAQS in **Table 4.2-1**, are generally more stringent and apply to more pollutants than the NAAQS. In addition to the criteria pollutants, CAAQS have been established for visibility reducing particulates, hydrogen sulfide, and sulfates.

The California Clean Air Act (CCAA), which was approved in 1988, requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with CAAQS. These AQMPs also serve as the basis for the preparation of the State Implementation Plan (SIP) for meeting NAAQS for the State of California. Like the U.S. EPA, CARB also designates areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a CAAQS for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events such as wildfires, volcanoes, etc. are not considered violations of a CAAQS, and are not used as a basis for designating areas as nonattainment.

Table 4.2-1: State and National Ambient Air Quality Standards

Pollutant	Averaging Time	State Standards[1]	National Standards[2]
Ozone (O_3) [2, 5, 7]	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm
	1 Hour	0.09 ppm (180 µg/m^3)	NA
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)
	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)
Nitrogen Dioxide (NO_2)	1 Hour	0.18 ppm (339 µg/m^3)	0.10 ppm[11]
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)
Sulfur Dioxide (SO_2) [8]	24 Hour	0.04 ppm (105 µg/m^3)	0.14 ppm (365 µg/m^3)
	1 Hour	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)
	Annual Arithmetic Mean	NA	0.03 ppm (80 µg/m^3)
Particulate Matter (PM10) [1, 3, 6]	24-Hour	50 µg/m^3	150 µg/m^3
	Annual Arithmetic Mean	20 µg/m^3	NA
Fine Particulate Matter (PM2.5) [3, 4, 6, 9]	24-Hour	NA	35 µg/m^3
	Annual Arithmetic Mean	12 µg/m^3	9.0 µg/m^3
Sulfates (SO_{4-2})	24 Hour	25 µg/m^3	NA
Lead (Pb) [10, 11]	30-Day Average	1.5 µg/m^3	NA
	Calendar Quarter	NA	1.5 µg/m^3
	Rolling 3-Month Average	NA	0.15 µg/m^3
Hydrogen Sulfide (H_2S)	1 Hour	0.03 ppm (0.15 µg/m^3)	NA
Vinyl Chloride (C_2H_3Cl) [10]	24 Hour	0.01 ppm (26 µg/m^3)	NA

Notes:

ppm = parts per million; µg/m^3 = micrograms per cubic meter; mg/m^3 = milligrams per cubic meter; NA = no information available.

Pollutant	Averaging Time	State Standards[1]	National Standards[2]

1. California standards for O_3, carbon monoxide (except Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, suspended particulate matter – PM10, and visibility reducing particles are values that are not to be exceeded. The standards for sulfates, Lake Tahoe CO, lead, hydrogen sulfide, and vinyl chloride are not to be equaled or exceeded. If the standard is for a 1-hour, 8-hour or 24-hour average (i.e., all standards except for lead and the PM10 annual standard), then some measurements may be excluded. Measurements are excluded that CARB determines would occur less than once per year on the average. The Lake Tahoe carbon monoxide standard is 6.0 ppm, a level one-half the national standard and two-thirds the State standard.

1. National standards shown are the "primary standards" designed to protect public health. National standards other than for O_3, particulates and those based on annual averages are not to be exceeded more than once a year. The 1-hour O_3 standard is attained if, during the most recent three-year period, the average number of days per year with maximum hourly concentrations above the standard is equal to or less than one. The 8-hour O_3 standard is attained when the 3-year average of the 4th highest daily concentrations is 0.070 ppm or less. The 24-hour PM10 standard is attained when the 3-year average of the 99th percentile of monitored concentrations is less than 150 µg/m_3. The 24-hour PM2.5 standard is attained when the 3-year average of 98th percentiles is less than 35 µg/m^3.

2. Except for the national particulate standards, annual standards are met if the annual average falls below the standard at every site. The national annual particulate standard for PM10 is met if the 3-year average falls below the standard at every site. The annual PM2.5 standard is met if the 3-year average of annual averages spatially-averaged across officially designed clusters of sites falls below the standard.

NAAQS are set by the U.S. EPA at levels determined to be protective of public health with an adequate margin of safety.

3. On October 1, 2015, the national 8-hour O_3 primary and secondary standards were lowered from 0.075 to 0.070 ppm. An area will meet the standard if the fourth-highest maximum daily 8-hour O_3 concentration per year, averaged over three years, is equal to or less than 0.070 ppm. U.S. EPA will make recommendations on attainment designations by October 1, 2016, and issue final designations October 1, 2017. Nonattainment areas will have until 2020 to late 2037 to meet the health standard, with attainment dates varying based on the O_3 level in the area.

4. The national 1-hour O_3 standard was revoked by the U.S. EPA on June 15, 2005.

5. In June 2002, CARB established new annual standards for PM2.5 and PM10.

6. The 8-hour California O_3 standard was approved by the CARB on April 28, 2005 and became effective on May 17, 2006.

7. On June 2, 2010, the U.S. EPA established a new 1-hour SO_2 standard, effective August 23, 2010, which is based on the 3-year average of the annual 99th percentile of 1-hour daily maximum concentrations. The existing 0.030 ppm annual and 0.14 ppm 24-hour SO_2 NAAQS however must continue to be used until one year following U.S. EPA initial designations of the new 1-hour SO_2 NAAQS.

8. In December 2012, U.S. EPA strengthened the annual PM2.5 NAAQS from 15.0 to 12.0 µg/m^3. In December 2014, the U.S. EPA issued final area designations for the 2012 primary annual PM2.5 NAAQS. Areas designated “unclassifiable/attainment” must continue to take steps to prevent their air quality from deteriorating to unhealthy levels. The effective date of this standard is April 15, 2015.

9. CARB has identified lead and vinyl chloride as ‘toxic air contaminants’ with no threshold level of exposure below which there are no adverse health effects determined.

10. National lead standard, rolling 3-month average: final rule signed October 15, 2008. Final designations effective December 31, 2011.

Source: *South Coast Air Quality Management District, Air Quality Management Plan, 2022; California Air Resources Board, Ambient Air Quality Standards, May 6, 2016, and U.S. EPA, NAAQS Table, February 7, 2024.*

Regional

South Coast Air Quality Management District

Regionally, air quality is governed by the South Coast Air Quality Management District (SCAQMD), the air pollution control agency for Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAQMD’s primary responsibility is ensuring that CAAQS and NAAQS are attained and maintained in the South Coast Air Basin

(SoCAB). The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and many other activities.

The SCAQMD is also the lead agency in charge of developing the Air Quality Management Plan (AQMP), with input from the Southern California Association of Governments (SCAG) and the CARB. The AQMP is a comprehensive plan that includes control strategies for stationary and area sources, as well as for some on-road and off-road mobile sources. SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. Under federal law, SCAG is designated as a Metropolitan Planning Organization and under State law as a Regional Transportation Planning Agency and a Council of Governments. SCAG has the primary responsibility for providing future growth projections and the development and implementation of transportation control measures. CARB, in coordination with federal agencies, provides the control element for mobile sources.

The 2016 AQMP was adopted by the SCAQMD Governing Board on March 3, 2017. The purpose of the AQMP is to set forth a comprehensive and integrated program that would lead the air basin into compliance with the federal 24-hour PM2.5 air quality standard, and to provide an update to the SCAQMD's commitments towards meeting the 8-hour O_3 NAAQS. Specifically, the 2016 AQMP covers the following NAAQS: 1979 1-hour O_3 NAAQS, 1997 8-hour O_3 NAAQS, 2006 24-hour PM2.5 NAAQS, 2008 8-hour O_3 NAAQS, and the 2012 annual PM2.5 NAAQS.

The 2022 AQMP, adopted by the SCAQMD Governing Board on December 2, 2022, was developed to address the requirements for meeting the 2015 8-hour O_3 standard. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulations, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NOX technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other FCAA measures to achieve the 2015 8-hour O_3 standard. An AQMP is a regional and multi-agency effort including the SCAQMD, the CARB, the SCAG, and the EPA. The 2022 AQMP incorporates the latest scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), entitled Connect SoCal 2024 RTP/SCS (referred to as "Connect SoCal") and updated emission inventory methodologies for various source categories. Connect SoCal was approved by SCAG regional council on April 4, 2024, however CARB must formally approve the plan.

The SCAQMD has published the CEQA Air Quality Handbook (approved by the SCAQMD Governing Board in 1993 and augmented with guidance for Localized Significance Thresholds [LSTs] in 2008). The SCAQMD guidance helps local government agencies and consultants to develop environmental documents required by California Environmental Quality Act (CEQA) and provides identification of suggested thresholds of significance for criteria pollutants for both construction and operation (see discussion of thresholds below). With the help of the CEQA Air Quality Handbook and associated guidance, local land use planners and consultants are able to analyze and document how proposed and existing projects affect air quality in order to meet the requirements of the CEQA review process. The SCAQMD periodically provides supplemental guidance and updates to the handbook on their website.

The State and federal attainment status designations for the SoCAB are summarized in **Table 4.2-2: South Coast Air Basin Attainment Status**. The SoCAB is currently designated as a nonattainment area for the O_3, PM10, and PM2.5 CAAQS, as well as the 8-hour O_3 and PM2.5 NAAQS. The SoCAB is designated as attainment or unclassified for the remaining CAAQS and NAAQS.

Table 4.2-2: Attainment Status of Criteria Pollutants in the South Coast Air Basin

Pollutant	State	Federal
Ozone – 1-hour	Nonattainment	Nonattainment
Ozone – 8-hour	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Attainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
Lead	Attainment	Nonattainment (Partial)
All others	Attainment/Unclassified	Attainment/Unclassified

Source: *South Coast Air Quality Management District, Air Quality Management Plan, 2022.*

The following is a list of SCAQMD rules that are required of construction and operational activities associated with the Project:

- **Rule 402 (Nuisance)** – This rule prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM10 suppression techniques are summarized below.
    - Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
    - All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.
    - All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
    - The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.

- Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the workday to remove soil tracked onto the paved surface.

Rule 431.2 (Sulfur Content of Liquid Fuels) – This rule limits the sulfur content in diesel and other liquid fuels for the purpose of both reducing the formation of sulfur oxides and particulates during combustion and to enable the use of add-on control devices for diesel fueled internal combustion engines.\

- **Rule 1113 (Architectural Coatings)** – This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.
- **Rule 1403 (Asbestos Emissions From Demolition/Renovation Activities)** – This rule applies to owners and operators of any demolition or renovation activity, and the associated disturbance of asbestos-containing material (ACM), any asbestos storage facility, or any active waste disposal site. This rule includes requirements for activities, handling and clean-up procedures, storage, disposal and landfill requirements.

Local

City of Long Beach General Plan

The following currently adopted General Plan goals, policies, and implementation measures from the current Air Quality Element of the Long Beach General Plan are relevant to air quality with respect to the Project:

Air Quality Element

- **Policy 2.1.1 Reduce Vehicle Trips:** Use incentives, regulations, and transportation demand management techniques, in cooperation with other jurisdictions in the South Coast Air Basin to eliminate vehicle trips that would otherwise occur.
- **2.1.1.1:** Establish and implement Transportation Demand Management Programs as they become economically feasible.
- **Policy 2.1.2 Reduce Vehicle Miles Traveled:** Use incentives, regulations, and transportation demand management in cooperation with other jurisdictions in the South Coast Air Basin, to reduce vehicle miles traveled.
- **21.2.6:** Add transportation demand management (TDM) considerations to the criteria for Site Plan Review, including a parking space reduction incentive for the provision of employee bicycle parking and shower /locker rooms, and other incentives.
- **Policy 2.4.1 Promote Non-Motorized Transportation:** Promote convenient and continuous bicycle paths and pleasant pedestrian environments that will encourage non-motorized travel within the City.
- **24.1.3:** Insure that all new development is designed and constructed to facilitate and encourage travel by carpool, vanpool, transit, bicycle, and foot.

- **2.4.1.8:** Provide convenient, secure bicycle parking facilities at public buildings, shopping centers, employment and activity centers, and multi-family developments (Transportation Element, TDM 5.1.6, Policy 7)
- **2.4.1.11:** Establish parking policies at employment centers consistent with the demand management provisions of this Element and of the Trip Reduction Ordinance. (Transportation Element, TDM 5.1.4, Policy 2)
- **Policy 7.1 Energy Conservation:** Reduce energy consumption through conservation improvements and requirements.
- **7.1.4:** Encourage the incorporation of energy conservation features in the design of all new construction.

City of Long Beach Municipal Code

Section 21.64.030, Transportation Demand and Trip Reduction Measures, of the City's municipal code provides transportation demand management design standards applicable to the Project, including requirements for bicycle racks.

4.2.2 Environmental Setting

Climate and Meteorology

The Project Site is in the SoCAB, which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SoCAB is a coastal plain with connecting broad valleys and low hills and is bounded by the Pacific Ocean in the southwest quadrant, with high mountains forming the remainder of the perimeter. The general region is in the semi-permanent high-pressure zone of the eastern Pacific. The climate is mild, tempered by cool sea breezes. This weather pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds.

The annual average temperature throughout the 6,645-square-mile SoCAB ranges from low 60 to high 80 degrees Fahrenheit (°F) with little variance. With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. All areas in the SoCAB have recorded temperatures above 100°F in recent years. January is typically the coldest month in this area of the SoCAB, with minimum temperatures in the 30s. In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all rain falls from November through April. Summer rainfall is normally restricted to widely scattered thundershowers near the coast with slightly heavier shower activity in the east and over the mountains.

Although the SoCAB has a semiarid climate, the air near the surface is typically moist because of the presence of a shallow marine layer. Except for infrequent periods when dry, continental air is brought into the SoCAB by offshore winds, the ocean effect is dominant. Periods of heavy fog, especially along the coastline, are frequent; low stratus clouds, often called high fog, are a characteristic climatic feature. Annual average humidity is 70 percent at the coast and 57 percent in the east portions of the SoCAB.

Wind patterns across the south coastal region are characterized by westerly and southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Wind speed is somewhat greater during the dry summer months than during the rainy winter season. Between periods of wind, periods of air stagnation may occur, both in the morning and evening hours. Air

stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall months, surface high-pressure systems over the SoCAB, combined with other meteorological conditions, can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished. The mountain ranges to the east affect the transport and diffusion of pollutants by inhibiting the eastward transport of pollutants. Air quality in the SoCAB generally ranges from fair to poor and is similar to air quality in most of coastal southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions.

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, there are two similarly distinct types of temperature inversions that control the vertical depth through which pollutants are mixed. These inversions are the marine/subsidence inversion and the radiation inversion. The height of the base of the inversion at any given time is known as the "mixing height." The combination of winds and inversions are critical determinants in leading to the highly degraded air quality in summer and the generally good air quality in the winter in the Project area.

Ambient Air Quality

Existing air quality is measured at established SCAQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. These standards represent the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. The SCAQMD monitors levels of various criteria pollutants at 37 permanent monitoring stations and five single-pollutant (Pb) air monitoring sites located throughout the SoCAB. The closest monitoring station to the Project Site is the I-710 monitoring station, located 1.69 miles to the west. The I-710 monitoring station records air quality data for NO_2 and PM2.5. The South Coastal LA County 2 and the South Coastal LA County 4 monitoring stations are located 4.71 miles south of the Project Site. The South Coastal LA County 2 monitoring station records air quality data for PM10 and the South Coastal LA County 4 monitoring station records air quality data for O_3 (years 2020 and 2021). As the I-710 and South Coastal LA County monitoring stations do not record CO data, data for CO is derived from the South-Central LA County monitoring station, located 3.37 northwest of the Project Site.

The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the State and federal standards. **Table 4.2-1** presents both federal and State ambient air quality standards. Air quality is considered to be in attainment if the measured ambient air pollutant levels for O_3, CO, SO_2, NO_2, PM10, and PM2.5 do not exceed federal or State standards.

Table 4.2-3: Project Area Air Quality Monitoring Summary 2020-2022 shows the most recent three years of monitoring data and identifies the number of days ambient air quality standards were exceeded. Data for O_3, CO, NO_2, PM10, and PM2.5 for 2020 through 2022 was obtained from air quality data tables produced by the SCAQMD. Data for SO_2 has been omitted as attainment is regularly met in the SoCAB and few monitoring stations measure SO_2 concentrations.

As shown in **Table 4.2-3**, O_3 levels exceeded the State 1-Hour Standard and State and Federal 8-Hour Standards in two of the three years for which data is presented. PM10 exceeded the State 24-Hour Standard for one of the three years shown and PM2.5 exceeded the Federal 24-Hour Standard for all three years shown.

Table 4.2-3: Project Area Air Quality Monitoring Summary 2020-2022

Pollutant	Standard	Year		
		2020	2021	2022
O_3[a]				
Maximum Federal 1-Hour Concentration (ppm)		0.105	0.086	0.108
Maximum Federal 8-Hour Concentration (ppm)		0.083	0.064	0.077
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	4	0	1
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	4	0	1
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	4.5	4.3	3.4
Maximum Federal 8-Hour Concentration	> 20 ppm	3.1	3.7	3.0
NO_2				
Maximum Federal 1-Hour Concentration (ppm)	> 0.100 ppm	0.090	0.092	0.095
Annual Federal Standard Design Value		0.022	0.025	0.025
PM10				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 150 µg/m^3	59	48	48
Annual Federal Arithmetic Mean (µg/m^3)		24.9	22.7	25.5
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m^3	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m^3	2	0	0
PM2.5				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 35 µg/m^3	44.0	84.6	39.0
Annual Federal Arithmetic Mean (µg/m^3)	> 12 µg/m^3	12.93	13.01	11.91
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m^3	2	7	1

Notes:
Data used from closest air monitoring site to the Project Site.
Ppm = Parts Per Million
µg/m3 = Microgram per Cubic Meter
Source: *Data for O_3, CO, NO_2, PM10, and PM2.5 was obtained from SCAQMD Air Quality Data Tables.*

4.2.3 Impact Analysis

SCAQMD Thresholds

The significance criteria established by SCAQMD may be relied upon to make the above determinations. According to the SCAQMD, an air quality impact is considered significant if a Project would violate an ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established numeric thresholds of significance for air pollutants resulting from construction and operational activities of land use development projects, as shown in **Table 4.2-4: South Coast Air Quality Management District Mass Daily Thresholds**.

Table 4.2-4: South Coast Air Quality Management District Mass Daily Thresholds

Pollutant	Mass Daily Thresholds (pounds per day)	
	Construction	Operations
Nitrogen Oxides (NOx)	100	55
Volatile Organic Compounds (VOC)[1]	75	55
Particulate Matter up to 10 Microns (PM10)	150	150
Particulate Matter up to 2.5 Microns (PM2.5)	55	55
Sulphur Oxides (SO_X)	150	150
Carbon Monoxide (CO)	550	550

Notes:
1. VOCs and reactive organic gases (ROGs) are subsets of organic gases that are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. Although they represent slightly different subsets of organic gases, they are used interchangeably for the purposes of this analysis.

Source: *South Coast Air Quality Management District, South Coast AQMD Air Quality Significance Thresholds, March 2023.*

Localized Significance Thresholds

The SCAQMD developed Localized Significance Thresholds (LSTs) for emissions of NO_2, CO, PM10, and PM2.5 generated at new development sites (off-site mobile source emissions are not included in the LST analysis). LSTs represent the maximum emissions that can be generated at a project without expecting to cause or substantially contribute to an exceedance of the most stringent State or federal ambient air quality standards. LSTs are based on the ambient concentrations of that pollutant within the Project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. LST analysis for construction is applicable for projects that disturb 5 acres or less on a single day. The City of Long Beach is located within SCAQMD SRA 4 (South Coastal Los Angeles County). The nearest sensitive receptors are located approximately 170 feet from the Project Site (approximately 52 meters). LSTs associated with the 52-meter threshold are provided in **Table 4.2-5: Local Significance Thresholds for Construction/Operations** for informational purposes and to demonstrate that the thresholds increase as acreages increase.

Table 4.2-5: Local Significance Thresholds for Construction/Operations

Project Size	Maximum Pounds Per Day[1,2]			
	NO_x	CO	PM10	PM2.5
1 Acre	61/61	799/799	13/3	6/2
2 Acres	84/84	1,119/1,119	18/5	8/2
5 Acres	124/124	1,920/1,920	30/8	12/3

Notes:
1. NO_X = Nitrogen Oxides; CO = Carbon Monoxide; PM10 = Particulate Matter 10 microns in diameter or less; PM2.5 = Particulate Matter 2.5 microns in diameter or less
2. Based on receptor distance of 52 meters in SRA 4.

Source: *South Coast Air Quality Management District, Localized Significance Threshold Methodology, July 2008.*

Localized Carbon Monoxide

"Hotspots" are localized concentrations of CO that exceed ambient air quality standards. The applicable standards are State one-hour standard of 20 ppm or the State eight-hour standard of 9 ppm. CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections.

Methodology

The Project's construction and operational emissions were calculated using the California Emissions Estimator Model version 2022.1.1.21 (CalEEMod). Details of the modeling assumptions and emission factors are provided in **Appendix B: Park Tower Student Housing Air Quality and Greenhouse Gas Emissions Analysis.**

For construction, CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. Per the Trip Generation and Vehicle Miles Screening Report prepared by Kimley-Horn for the Project, the Project is anticipated to generate approximately 507 daily vehicle trips.

Construction Emissions

Calculation of construction-related emissions is based on activities associated with construction of the Project. Construction activities would include demolition of the existing interior structures and surfaces, interior and exterior building construction, and application of architectural coating. Demolition of the existing asphalt/concrete and buildings would result in approximately 6,394 total tons of material that would be demolished and transported off-site. CalEEMod was utilized to calculate construction emissions resulting from use of construction equipment during the phases of activities as well as on-road vehicle emissions from vehicle usage for construction workers, vendor trucks, and haul trucks traveling to and from the site. CalEEMod defaults for vendor trips were adjusted based on a ratio of the total vendor trips to the number of days of each subphase of construction.

Construction equipment employed would include excavators, tractors, graders, cranes, forklifts, loaders, backhoes, welders, paving equipment, cement and mortar mixers, and air compressors. Each piece of equipment was assumed to operate between six to eight hours a day during the applicable phase of construction. For purposes of the analysis, construction of the Project is expected to commence in January 2025 and would end in March 2026.

Operational Emissions

Operation of the Project results in emissions from area sources (e.g., landscaping, maintenance equipment.), mobile sources (e.g., automobiles and trucks), and energy sources (e.g., natural gas

usage). Area source emissions would be produced through evaporation of solvents in surface coatings such as primers, paints, and varnishes. In addition, area source emissions would include emissions from use of landscaping equipment and consumer products such as detergents, cleaning compounds, personal care products, and lawn and garden products. These emissions were calculated using defaults provided in CalEEMod.

Energy source emissions would include emissions produced through the use of natural gas CalEEMod defaults were used to estimate the natural gas usage for the Project.

Mobile source emissions were primarily derived from vehicle trips generated by the Project, including employee trips to and from the site and truck. Trip generation rates and vehicle fleet mix used in the analysis are further discussed in **Section 4.18, Transportation**. Emissions estimates for on-road travel was calculated using CalEEMod.

Thresholds of Significance

The following significance criteria for air quality is from the Environmental Checklist in State CEQA Guidelines Appendix G. An impact would be considered significant and would require mitigation if it would meet one of the following criteria:

- Conflict with or obstruct implementation of the applicable air quality plan.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or State ambient air quality standard.
- Expose sensitive receptors to substantial pollutant concentrations.
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

As discussed in the Initial Study, provided in **Appendix A** of this EIR, and in **Section 6.0, Other CEQA Considerations**, the Project would have a less than significant impact to the public related to odors. During construction, some odors related to diesel exhaust and VOCs from architectural coatings and paving activities may occur, however these would be temporary and would disperse rapidly. As such, no further analysis of this topic in this section is necessary.

Project Impacts

Threshold AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1: Less than Significant Impact.

As part of its enforcement responsibilities, the U.S. EPA requires that each State with nonattainment areas prepare and submit a SIP that demonstrates the means to attain the federal standards. The SIP must integrate federal, State, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the CCAA requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the NAAQS and CAAQS. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The SCAQMD is required, pursuant to the FCAA, to reduce criteria pollutant emissions for which SoCAB is in nonattainment. To reduce such emissions, the SCAQMD prepared the 2022 AQMP, which establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving State and national air quality standards. The AQMP is a regional and multi-agency effort including the SCAQMD, the CARB, the SCAG, and the U.S. EPA. The AQMP's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's RTP/SCS, which includes the latest growth forecasts for the region and provides updated emission inventory methodologies for various source categories. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans.

Criteria for determining consistency with the AQMP are defined by the following indicators:

Consistency Criterion No. 1: A proposed project would not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of the AQMP's air quality standards or the interim emissions reductions.

Consistency Criterion No. 2: A proposed project would not exceed the AQMP's assumptions or increments based on the years of the project buildout phase.

Consistency Criterion No. 1 refers to the CAAQS and NAAQS. As indicated in **Table 4.2-6** and **Table 4.2-7**, Project construction and operational emissions would be below South Coast AQMD's thresholds. As the Project would not generate localized construction or regional construction or operational emissions that would exceed SCAQMD thresholds of significance, the Project would not violate any air quality standards. Therefore, the Project would be consistent with Criterion No. 1.

Consistency Criterion No. 2 refers to SCAG's growth forecasts and associated assumptions included in the AQMP. The future air quality levels projected in the AQMP are based on SCAG's growth projections, which are based, in part, on the general plans of cities located within the SCAG region. Therefore, projects that are consistent with the applicable assumptions used in AQMP development would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

Concerning Consistency Criterion No. 2, the AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts; SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. Therefore, it is reasonable to conclude that if a project is consistent with the applicable general plan land use designation, and if the general plan was adopted prior to the applicable AQMP, then the increase in vehicle miles traveled (VMT) and/or population generated by said project would have been included in the applicable AQMP's assumed VMT and population growth.

The Project would not conflict with the Community Commercial designation's intended uses (a range of automobile-oriented commercial uses). Additionally, with a FAR of approximately 0.07, the Project would be below the Community Commercial land use designations permitted FAR of 1.0. The Project's proposed land uses would be consistent with the General Plan's land use designations, which are the basis for the AQMP. Therefore, the Project's forecast population growth and VMT would be consistent with the AQMP's assumed population growth and VMT for the Project Site. It is also noted that the Project's construction and operational air emissions would not exceed the SCAQMD regional thresholds, and localized emissions during construction and operations would not exceed SCAQMD LST thresholds; see Threshold AQ-2 and Threshold AQ-3 below for further analysis. As such, the Project would be consistent with Criterion No. 2.

Therefore, the Project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant.

Threshold AQ-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?

Impact AQ-2: Less Than Significant Impact

Construction Emissions

Construction associated with the Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include ozone-precursor pollutants (i.e., ROG and NO_X), PM10, and PM2.5. Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Construction results in the temporary generation of emissions resulting from interior demolition, site preparation, site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities as well as weather conditions and the appropriate application of water.

The duration of construction activities for the Project is estimated to be approximately 15 months, conservatively modeled to begin in January 2025. Construction-generated emissions associated with the Project were calculated using the California Air Resources Board (CARB)-approved California Emissions Estimator Model version 2022.1.1. (CalEEMod), which is designed to model emissions for land use development projects, based on typical construction requirements. See **Appendix B: Park Tower Student Housing Air Quality and Greenhouse Gas Analysis** for more information regarding the construction assumptions used in this analysis. Predicted maximum daily construction-generated emissions for the Project are identified in **Table 4.2-6: Project Construction Emissions**. As shown in **Table 4.2-6**, Project construction emissions would be below SCAQMD thresholds for all criteria pollutants. It is noted the Project would also be required to comply with SCAQMD Rules 402 and 1113, which prohibit nuisances and limit VOC content in paints, respectively, and Rule 403 requiring fugitive dust controls (required for all projects). Rule 403 was Compliance with SCAQMD rules 402, 403, and 1113 would further reduce specific construction-related emissions. As shown above, all criteria pollutant emissions would be below their respective thresholds and impacts would be less than significant.

Table 4.2-6: Project Construction Emissions

Construction Year	Emissions (pounds per day)[1]					
	ROG	NO_x	CO	SO_2	PM10	PM2.5
2025	6.74	13.2	16.7	0.03	1.91	0.59
2026	6.66	12.5	16.1	0.03	1.12	0.55
SCAQMD Threshold	75	100	550	150	150	55
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
1. SCAQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment. Refer to **Appendix B** for model data outputs.

Source: *CalEEMod version 2022.1.1 Refer to **Appendix B** for model outputs.*

Operational Emissions

Operational emissions are typically associated with mobile sources (i.e., motor vehicle use) and area sources (such as the use of landscape maintenance equipment, consumer products, and architectural coatings). Energy source emissions would be generated from electricity and natural gas (non-hearth) usage. **Table 4.2-7: Project Operational Emissions** summarizes the operational emissions attributable to the Project. As shown in **Table 4.2-7**, the Project's net operational emissions would not exceed SCAQMD thresholds. Therefore, regional operational emissions would result in a less than significant long-term regional air quality impact.

Table 4.2-7: Project Operational Emissions

Source	Pollutants (pounds per day)[1]					
	ROG	NO_x	CO	SO_2	PM10	PM2.5
Area	4.42	0.13	14.3	0.001	0.01	0.01
Energy	0.02	0.42	0.18	0.003	0.03	0.03
Mobile	1.58	1.12	13.1	0.03	2.99	0.77
Total Project Emissions	***6.03***	***1.67***	***27.6***	***0.04***	***2.99***	***0.82***
SCAQMD Threshold	55	55	550	150	150	55
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
1. Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in **Appendix B.**

Source: *CalEEMod version 2022.1.1 Refer to **Appendix B** for model outputs.*

Cumulative Short-Term Emissions

The SoCAB is designated nonattainment for ozone, PM10, and PM2.5 for State standards and nonattainment for ozone and PM2.5 for federal standards. The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the FCAA mandates. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout SoCAB, which would include related cumulative projects. As concluded above, the Project's construction-related air quality impacts would be less than significant. Compliance with SCAQMD rules and regulations would further minimize the construction-related emissions. Therefore, construction emissions, in combination with those from other projects in the area, would not substantially deteriorate the

local air quality. The Project's construction-related emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Cumulative Long-Term Impacts

The South Coast AQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to SoCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.

As concluded above, the Project's operational-related air quality impacts would be less than significant. As a result, operational emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Therefore, Project operations would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant.

Threshold AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3: Less Than Significant Impact

Localized Construction Impacts

To identify impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with project-specific emissions. The City of Long Beach is located within SRA 4. As such, this analysis utilizes the localized significance threshold for SRA 4. LSTs apply to CO, NO_2, PM10, and PM2.5. The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size. However, the project construction is not anticipated to disturb any acres in a single day as site preparation and grading is not required. The LST guidance provides thresholds for projects disturbing 1-, 2-, and 5-acres in size and the thresholds increase with size of the site. Since the Project is not anticipated to disturb any acres, the 1-acre LST threshold was conservatively used in this analysis.

The SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The nearest sensitive receptors are the residences located approximately 170 feet (approximately 52 meters) to the west of the Project Site. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, LSTs for 52 meters were interpolated and utilized in this analysis. **Table 4.2-8: Localized Significance of Construction Emissions** shows the results of localized emissions during construction activity. This table represents the worse-case scenario and are based on peak earthwork volumes anticipated. As shown in **Table**

4.2-8, localized Project construction emissions would not exceed SCAQMD thresholds and impacts would be less than significant.

Table 4.2-8: Localized Significance of Construction Emissions

Source/Activity	Emissions (pounds per day)[1,2]			
	NO_x	CO	PM10	PM2.5
Demolition (2025)	6.09	8.49	1.29	0.41
Exterior Building Construction (2025)	9.85	11.6	0.38	0.35
Exterior Building Construction (2026)	9.35	11.5	0.34	0.31
Architectural Coating (2025)	1.76	2.28	0.05	0.05
Architectural Coating (2026)	1.71	2.27	0.05	0.04
Maximum Daily Emissions	*9.85*	*11.6*	*1.29*	*0.41*
SCAQMD LST (1.0 acre site with nearest receptor distance of 52 meters)	61	799	13	6
Maximum Daily Emissions Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

Notes:
1. Maximum emissions may not add up exactly due rounding in the modeling calculations. Detailed emissions calculations are provided in **Appendix B**
2. SCAQMD Rule 403 Fugitive Dust applied for construction emissions. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads three times daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment. Refer to **Appendix B** for model data outputs.

Source*: CalEEMod version 2022.1.1. Refer to **Appendix B** for model outputs.*

Localized Operation Impacts

According to the SCAQMD localized significance threshold methodology, operational LSTs apply to on-site sources. LSTs for receptors located at approximately 52 meters for SRA 4 were utilized in this analysis. Although the Project Site is 1.2-acres, the 1-acre LST threshold was conservatively used because the LSTs increase with the size of the site. Therefore, the 1-acre LSTs are conservative for evaluation of a 1.2-acre site.

The on-site operational emissions were calculated using CalEEMod and are compared to the LSTs in **Table 4.2-9: Localized Significance of Operational Emissions**. The operational emissions shown in **Table 4.2-7** include all on-site Project-related stationary sources (i.e., area and energy). As shown in **Table 4.2-9**, the maximum daily emissions of these pollutants during Project operations would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, the Project would result in a less than significant impact concerning LSTs during operational activities.

Table 4.2-9: Localized Significance of Operational Emissions

Activity	Emissions (pounds per day)[1]			
	NO_x	CO	PM10	PM2.5
On-Site Emissions (Area and Energy Sources)	0.55	14.4	0.05	0.04
SCAQMD Localized Screening Threshold (1 acre at 52 meters)	*61*	*799*	*3*	*2*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

Activity	Emissions (pounds per day)[1]			
	NO_X	CO	PM10	PM2.5

Notes:
1. Emissions were calculated using the California Emissions Estimator Model version 2022.1.1. (CalEEMod), as recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported.

Source: *CalEEMod version 2022.1.1. Refer to* ***Appendix B*** *for model outputs.*

Carbon Monoxide Hot Spots

An analysis of CO "hot spots" is needed to determine whether the change in the level of service (LOS) of an intersection from the Project would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. An analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 *Air Quality Management Plan*. The Basin was re-designated as attainment in 2007 and is no longer addressed in the SCAQMD's Air Quality Management Plan (AQMP).

The 2003 *Air Quality Management Plan* is the most recent AQMP that addresses CO concentrations. As part of the SCAQMD CO Hotspot analysis, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 parts per million (ppm), which is well below the 35-ppm federal standard. The Project considered herein would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's 2003 CO hot-spot analysis. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any vicinity intersections from 507 daily vehicle trips attributable to the Project. Therefore, impacts would be less than significant in this regard.

TAC Impacts

TAC emissions associated with residential housing development could occur during construction, from diesel-powered heavy duty off-road equipment needed to demolish, excavate, and haul material, diesel-powered vendor trucks bringing supplies to the construction site, and from the use of materials containing TACs (such as architectural coatings), and during operations, from diesel-powered delivery trucks and from the use of TAC-containing materials for maintenance purposes. As stated above, TAC emissions from construction of the Project would be minimal and temporary because the Project proposes to adaptively reuse an existing building, thereby avoiding the need for excavation, and greatly reducing the amount of demolition and raw materials to be hauled to and from the Project Site. Compliance with the SCAQMD's rules limiting the VOC content of coatings will minimize emissions during surface coating activities. The construction duration is expected to be 15 months. Operations would include deliveries for the on-site kitchen, which may rely on diesel-powered trucks. However, compliance with the State's anti-idling

regulations will minimize DPM emissions during deliveries. Therefore, TAC impacts would be less than significant.

Criteria Pollutant Health Impacts

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. County of Fresno* [Friant Ranch, L.P.] [2018] 6 Cal.5th 502). The SCAQMD has set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme ozone nonattainment areas such as the SoCAB) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and SCAQMD Rule 1303 for new or modified sources. The NSR Program was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based NAAQS. The NAAQS establish the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the SCAQMD's mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts would occur.

NO_X and ROG are precursor emissions that form ozone in the atmosphere in the presence of sunlight where the pollutants undergo complex chemical reactions. It takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources. Breathing ground-level ozone can result in health effects that include reduced lung function, inflammation of airways, throat irritation, pain, burning, or discomfort in the chest when taking a deep breath, chest tightness, wheezing, or shortness of breath. In addition to these effects, evidence from observational studies strongly indicates that higher daily ozone concentrations are associated with increased asthma attacks, increased hospital admissions, increased daily mortality, and other markers of morbidity. The consistency and coherence of the evidence for effects upon asthmatics suggests that ozone can make asthma symptoms worse and can increase sensitivity to asthma triggers.

The SCAQMD's 2022 AQMP focuses on the 2015 8-hour ozone standard with achieving attainment in 2037. The largest source of NO_X emissions (an O_3 precursor) in 2018 were related to on-road sources. The 2022 AQMP also emphasizes a shift in focus beyond on-road emissions to off-road sources. The 2022 AQMP identifies a 67 percent NO_X reduction beyond the current 2037 baseline and about 83 percent below current levels. In order to achieve this, the SCAQMD identifies the need for widespread adoption of zero emissions (ZE) technologies across all mobile sectors and stationary sources.

The control strategy for the 2022 AQMP includes aggressive new regulations and the development of incentive programs to support early deployment of advanced technologies. The two key areas for incentive programs are (1) promoting widespread deployment of available ZE and low NO_X technologies and (2) developing new ZE and ultra-low NO_X technologies for use in cases where the technology is not currently available. SCAQMD will prioritize distribution of incentive funding in EJ areas and seek opportunities to focus benefits on the most disadvantaged communities. The 2022 AQMP includes a total of 49 control measures. In addition to the NO_X measures, the 2022 AQMP relies on co-benefits from climate and energy efficiency programs for further reductions, limited strategic measures for VOC reductions, and other actions.

The SCAQMD's air quality modeling demonstrates that NO_X reductions prove to be much more effective in reducing ozone levels and will also lead to a significant decrease in $PM_{2.5}$ concentrations. NO_X-emitting stationary sources regulated by the SCAQMD include Regional

Clean Air Incentives Market (RECLAIM) facilities (e.g., refineries, power plants, etc.), natural gas combustion equipment (e.g., boilers, heaters, engines, burners, flares) and other combustion sources that burn wood or propane. The AQMP identifies robust NO_X reductions from new regulations on RECLAIM facilities, non-refinery flares, commercial cooking, and residential and commercial appliances. Such combustion sources are already heavily regulated with the lowest NO_X emissions levels achievable but there are opportunities to require and accelerate replacement with cleaner zero-emission alternatives, such as residential and commercial furnaces, pool heaters, and backup power equipment. The SCAQMD plans to achieve such replacements through a combination of regulations and incentives. Technology-forcing regulations can drive development and commercialization of clean technologies, with future year requirements for new or existing equipment. Incentives can then accelerate deployment and enhance public acceptability of new technologies.

The AQMP also emphasized that beginning in 2012, continued implementation of previously adopted regulations will lead to NO_X emission reductions of 68 percent by 2023 and 80 percent by 2031. With the addition of 2016 AQMP proposed regulatory measures, a 30 percent reduction of NO_X from stationary sources is expected in the 15-year period between 2008 and 2023. This is in addition to significant NO_X reductions from stationary sources achieved in the decades prior to 2008.

As previously discussed, the Project's construction-related and operational emissions would not exceed SCAQMD thresholds, thus, would be less than significant; see **Table 4.2-6 and Table 4.2-7,** respectively. The on-site Project emissions' localized effects on nearby receptors were also found to be less than significant; see **Table 4.2-8** and **Table 4.2-9**. The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable NAAQS or CAAQS. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations such as asthmatics, children, and the elderly. As shown above, Project-related emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the ambient air quality standards or cause an increase in the frequency or severity of existing violations of air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels more than the health-based ambient air quality standards.

Construction-Related Diesel Particulate Matter

Construction of the Project would generate diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment would dissipate rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities.

The California Office of Environmental Health Hazard Assessment (OEHHA) has not identified short-term health effects from DPM. Construction is temporary and would be transient throughout a site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time. Construction activities would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than five minutes to further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. For these reasons, DPM generated by construction activities would not expose sensitive receptors to substantial amounts of air toxins, and the Project would result in a less than significant impact.

Cumulative Impacts

Section 3.3, Cumulative Development, identifies no related projects within an approximately 1-mile radius of the Project Site that are planned, under construction, or have been recently completed. Analysis of cumulative impacts is based on guidance provided by the SCAQMD[1], which provides that the same significance thresholds are generally employed for project specific and cumulative impacts. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. The only exception is differing significance thresholds for project-specific and cumulative impacts associated with TAC emissions. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

For purpose of the cumulative analysis, the geographic scope would be the SCAB. The cumulative impacts analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily threshold for project specific impacts would not cause a cumulatively considerable increase in emissions for those pollutants for which SCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Conversely, project-level construction and operational emissions that exceed SCAQMD thresholds would be considered cumulatively considerable. As discussed in **Section 4.2.2, Environmental Setting**, the SCAB is in nonattainment of the CAAQS for O_3 (both 1-hour and 8-hour standards), PM10, and PM2.5, and the NAAQS for O_3 (8-hour standard) and PM2.5.

As discussed in **Section 4.2.3, Impact Analysis***,* construction of the Project would not result in exceedances of regional thresholds. Therefore, the Project's construction-source emissions would be considered less than significant on both a Project-specific basis and cumulative basis.

As discussed in **Section 4.2.3, Impact Analysis**, Project operational-source air pollutant emissions would not result in exceedances of regional thresholds. Therefore, Project operational-source emissions would be considered less than significant on Project-specific and cumulative basis.

Mitigation Measures:

No mitigation is required as impacts would be less than significant.

[1] Goss, Tracy A and Kroeger, Amy. White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. [Online] South Coast Air Quality Management District, 2003. http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impactsworking-group/cumulative-impacts-white-paper.pdf

Level of Significance After Mitigation:

Not applicable. Project-specific and cumulative impacts related to air quality would be less than significant.

4.3 Cultural Resources

This Section of the EIR evaluates potential impacts to cultural resources, including archaeological resources, as well as the inadvertent discovery of human remains, that could result from implementation of the Project and identifies measures to reduce or avoid significant impacts. The evaluation of cultural resources is based on the Cultural Resources Assessment prepared by BCR Consulting LLC on May 23, 2024 contained in **Appendix C**, **Cultural Resources Assessment**.

4.3.1 Regulatory Setting

Federal

Preservation Act and National Register of Historic Places

The National Historic Preservation Act of 1966 (NHPA)(16 U.S.C. ch. 1A, subch. II; § 470), established the National Register of Historic Places (National Register) as "an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the Nation's historic resources and to indicate what properties should be considered for protection from destruction or impairment." The National Register recognizes a broad range of cultural resources that are significant at the national, State, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. A resource that is listed in or eligible for listing in the National Register is considered "historic property" under Section 106 of the NHPA. Section 106 of the NHPA also requires federal agencies to consult with State Historic Preservation Officers (SHPOs) and Tribal Historic Preservation Officers (THPOs) if their projects have the potential to affect a historic resource eligible for or listed on the National Register. The National Register identifies more than 98,000 properties as possessing exceptional national significance in American history and culture.

Criteria

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 of the Code of Federal Regulations (CFR), part 60, section 60.4(g). The resource must also be significant in American history, architecture, archaeology, engineering, or culture. The following four criteria for evaluation of eligibility for listing have been established to determine the significance of a resource. A property is eligible for listing if:

A. It is associated with events that have made a significant contribution to the broad patterns of our history;

B. It is associated with the lives of persons significant in our past;

C. It embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. It has yielded, or may be likely to yield, information important in prehistory or history.

Context

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning... is made clear." A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the National Register.

Integrity

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as "the ability of a property to convey its significance." The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than state or local registers.

Criteria Considerations

Certain types of properties, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the seven categories of Criteria Considerations A through G, in addition to meeting at least one of the four significance criteria and possess integrity, as defined above. Criteria Consideration G is intended to prevent the listing of properties for which insufficient time may have passed to allow the proper evaluation of their historical importance. The full list of Criteria Considerations is provided below:

A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or

B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

C. A birthplace or grave of a historical figure of outstanding importance, if there is no other appropriate site or building directly associated with his or her productive life; or

D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or

G. A property achieving significance within the past 50 years if it is of exceptional importance.

Secretary of the Interior's Standards

The National Park Service (NPS) issued the Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards) with accompanying guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The most applicable guidelines should be used when evaluating a project for compliance with the Secretary's Standards. Although none of the four treatments, as a whole, apply specifically to new construction in the vicinity of historic resources, Standards #9 and #10 of the Secretary's Standards provides relevant guidance for such projects. The Standards for Rehabilitation are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

It is important to note that the Secretary's Standards are not intended to be prescriptive but, instead, provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard

necessarily applies to every aspect of a project, and it is not necessary for a project to comply with every Standard to achieve compliance.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA)(25 U.S.C. ch. 32 § 3001 *et seq*.) provides for the protection of Native American human remains and funerary and cultural objects and requires federal agencies to return Native American cultural items to the appropriate federally recognized Indian tribes or Native Hawaiian groups with which they are associated.[1]

Archaeological Resources Protection Act

The Archaeological Resources Protection Act of 1979 (ARPA)(16 U.S.C. §§ 470aa - 470mm) governs the excavation, removal, and disposition of archaeological sites and collections on federal and Native American lands. The ARPA defines archaeological resources as any material remains of human life or activities that are at least 100 years of age, and which are of archeological interest. The ARPA makes it illegal for anyone to excavate, remove, sell, purchase, exchange, or transport an archaeological resource from federal or Native American lands without a proper permit.[2]

Archeological and Historic Preservation Act of 1974

The Archeological and Historic Preservation Act of 1974 (AHPA)(54 U.S.C. §§ 312501-312508) requires agencies to report any perceived project impacts on archaeological, historical, and scientific data and requires them to recover such data or assist the Secretary of the Interior in recovering the data.

State

California Environmental Quality Act

The California Environmental Quality Act (CEQA)(Pub. Res. Code § 21000 *et seq.*) is the principal statute governing environmental review of projects occurring in the State. CEQA requires lead agencies to determine if a Project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

CEQA Guidelines Section 15064.5 defines a “historic resource” as including the following:

> (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.).
>
> (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the

[1] NPS, Native American Graves Protection And Repatriation Act, 1990.
[2] NPS, Technical Brief # 20: Archeological Damage Assessment: Legal Basis and Methods, February 2007, https://www.nps.gov/subjects/archeology/upload/tchBrf20_508.pdf. Accessed August 1, 2024.

preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following:

(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

(B) Is associated with the lives of persons important in our past;

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses

high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083 if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place.[3] If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an

[3] California Public Resources Code Section 21083.1(a).

archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.[4]

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired."[5] According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary's Standards is considered to have impacts that are less than significant.[6]

California Register of Historical Resources

The California Register of Historical Resources (California Register)(Pub. Res. Code § 5024.1) is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change." The California Register was established in 1993, and its regulations became effective on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria. Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, State, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

2. Is associated with the lives of persons important in our past;

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

4. Has yielded, or may be likely to yield, information important in prehistory or history.

[4] State CEQA Statute and Guidelines, Section 15064.5(c)(4).
[5] State CEQA Guidelines, Section 15064.5(b)(1).
[6] State CEQA Guidelines, 15064.5(b)(3).

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register. Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

California Health and Safety Code

California Health and Safety Code Sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable sections of the Public Resources Code), and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

California Public Resources Code

Public Resources Code Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities consider the possibility of multiple burials. Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails

to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

4.3.2 Environmental Setting

The Cultural Resources Assessment prepared for the Project Site was completed on May 23, 2024 by BCR Consulting, LLC, and is included in **Appendix C**. The following sections include a summary of description of the environmental setting.

Existing Conditions

The Project Site is currently developed with a seven-story office building and three levels of subterranean parking built in 1981. The existing office building is approximately 120,000 sf of which 109,600 sf is currently leased (as of January 2024). The western side of the Project Site adjacent to Clark Avenue includes a surface parking lot, driveway, and landscaping. The Project Site is bounded by the Pacific Coast Highway to the north and east, East Anaheim Street to the south, and Clark Avenue to the west. There is signage for the existing office building on the northern corner of the Project Site along Pacific Coast Highway. The Project Site is surrounded by commercial, office, residential, and religious uses to the north and east past the Pacific Coast Highway; Recreational Park Golf Course 18 to the south; and commercial and residential uses to the west.

Natural Setting

The local geologic region coincides with the physiographic area known as the Los Angeles Basin. It is characterized as a transverse-oriented lowland basin and coastal plain approximately 50 miles long and 20 miles wide. The basin originated as a deep marine trough during the Pliocene (7-2 million years ago) that eventually filled with shallow water fossil bearing sediments. By the beginning of the Pleistocene (after 2 million years ago), uplifting created the series of plains and mesas along the coast that now characterize the area. Local rainfall ranges from 5 to 15 inches annually. Local vegetation communities are naturally dominated by coastal sage scrub and riparian vegetation, although urbanization prevents its proliferation in much of the Project area.

Historic Setting

The Project Site is located within the traditional boundaries of the Gabrielino (or Tongva) Native Americans. The Gabrielino name has been attributed by association with the Spanish mission of San Gabriel and refers to a subset of people sharing speech and customs with other Cupan speakers (such as the Juaneño/Ajachemem) from the greater Takic branch of the Uto-Aztecan language family. The Gabrielino were semi-nomadic hunter-gatherers who subsisted by exploitation of seasonably available plant and animal resources.

Spanish Period

The area that would become Long Beach was first explored by Europeans in the late 18th century, with the arrival of Spanish explorers and missionaries. The Mission San Gabriel was set up in 1771 in what today is the City of San Gabriel, located approximately 21 miles north of the Project Site.

Mexican Period

In 1821, Mexico overthrew Spanish rule and the missions began to decline. By 1833, the Mexican government passed the Secularization Act, and the missions, reorganized as parish churches, lost their vast land holdings, and released their neophytes.

American Period

The American Period, beginning in 1848 and extending to the present day, began with the Treaty of Guadalupe Hidalgo. In 1850, California was accepted into the Union of the United States primarily due to the population increase created by the Gold Rush of 1849. The cattle industry reached its greatest prosperity during the first years of the American Period. Mexican Period land grants had created large pastoral estates in California, and demand for beef during the Gold Rush led to a cattle boom that lasted from 1849 to 1855. However, beginning about 1855, the demand for beef began to decline due to imports of sheep from New Mexico and cattle from the Mississippi and Missouri Valleys. When the beef market collapsed, many California ranchers lost their ranchos through foreclosure. A series of disastrous floods in 1861 and1862, followed by a significant drought further diminished the economic impact of local ranching. This decline combined with ubiquitous agricultural and real estate developments of the late 19th century, set the stage for diversified economic pursuits that continue to this day.

Local Sequence

The Long Beach area was part of the Spanish-era Rancho Los Nietos (originally called La Zanja) granted in 1784 to Jose Manuel Nieto, a soldier from San Diego. The property included 300,000 acres of land that stretched south from the present-day City of Whittier to the Pacific Ocean. It was eventually cut in half due to claims by the priests of San Gabriel that it encroached on Mission lands. Nieto retired from the Spanish Military in 1795 to focus on ranching activities until his death in 1804. His widow and five children inherited the property, and it was managed by his oldest son Juan Jose. When Mexico gained independence, Rancho Los Nietos was divided among the family into five smaller ranchos: Santa Gertrudes, Las Bolsas, Los Alamitos, Los Cerritos, and Los Coyotes. Within the next 10 years all had been sold outside the Nieto family. In 1844 Los Cerritos (which contained the project area) was sold to John “Don Juan” Temple, a successful American merchant who came to California and married a Spanish-Californian wife. Temple retained the ranch when California was ceded to the U.S. and continued to manage operations on the property until the drought of the 1860s decimated his herd. He sold the property to an American firm called Flint, Bixby, & Co. in 1866 and Jotham Bixby purchased it from the firm for his family in 1869. The Bixbys initially raised sheep, but in the late 19th century they began to sell parcels to the growing American immigrant population. Four thousand acres were purchased by William E. Willmore, who attempted to develop a farm community named Willmore City. Willmore failed and the land was subsequently purchased by the Long Beach Land and Water Company, who named the community Long Beach.

The City of Long beach was incorporated in 1897 and a modern economy began to take shape. During the early 20th century local commerce was led by resort-based businesses and farming, but by the 1940s the oil industry, Navy facilities, and port dominated the scene. The development of these industries between 1921 and 1936 tripled the Long Beach population and highlighted the need for major infrastructure improvements to the Port of Long Beach and the Port of Los Angeles. Flood control efforts during the 1930s rerouted the Los Angeles River from one-half east to its current location along the Project Site’s western boundary, enabling development of land previously prone to flooding. In 1933, a 6.4 earthquake destroyed many of the City’s masonry buildings and disabled local natural gas utilities. The damage prompted Long Beach to adopt stricter construction codes, and the revitalization efforts resulted in many new Art Deco or

Streamline Moderne style buildings which remain visible in much of today's cityscape. More ubiquitous local trends of the 1930s brought housing shortages which, in combination with the Great Depression, prompted the County of Los Angeles to create a housing authority. This new organization was responsible for Southern California's first affordable housing complex in Long Beach, known as the Carmelitos Housing Project. The project was completed in 1939 and included 67 buildings on 50 acres, all of which were inhabited within a year. This initial success led to the development of the Ramona Gardens and Harbor Hills complexes, both completed in 1941. Like many port cities, World War II brought a bustling military industry to Long Beach which caused significant economic boosts, as well as ethnic upheaval. A large Japanese population on Terminal Island was subject to internment during the war and despite the efforts mentioned above, the continuing housing shortage displaced many Greek and Portuguese immigrants. At the same time the African American population of Long Beach expanded considerably as part of the most consequential years of the Great Migration from the rural south. After the war, many veterans moved to Long Beach prompting privately-funded development of new residential neighborhoods as well as corresponding infrastructure and expanded City services. These population pressures served to erase most traces of orchards, dairies, and other agricultural developments from the early part of the century. The trends, markedly visible throughout much of California, were decidedly magnified in Long Beach. As the population continued to grow and diversify, civil rights activists and lawmakers teamed up to enact legislation and policies to encourage more fair access to housing and services. Expansion into the Bixby Knolls and North Long Beach areas followed along with 9.8 square miles of land annexation, most of which was allotted for new subdivisions and residential in-fill throughout the City. Expansion included more intensive use and development of municipal City properties evidenced by a master plan for parks, shoreline, and city beautification (adopted in 1954) and by more utilitarian developments such as municipal facilities, including the subject property. Growth slowed during the 1960s and did not resume significantly until the 1980s. By this time new residents from Southeast Asia, Mexico, and Central and Latin America immigrated to Long Beach expanding the population from 361,344 in 1980 to 461,257 in 2010. The accompanying redevelopment again began to reshape the City's appearance and six blocks in downtown were demolished for new construction projects. Late-century developments include the construction of the Aquarium of the Pacific, and adaptive reuse of many old buildings and structures for commercial and residential purposes that continues today. The local economy has gone from an oil and military emphasis during World War II, diversifying to include aerospace and other industries after the war. In spite of significant reductions, Boeing remains the largest private employer in the City. In the last 20 years, electronics, health care, and entertainment businesses have added to the diversifying economy.

4.3.3 Impact Analysis

Methodology

Research conducted for the Cultural Resources Assessment was completed pursuant to CEQA, the Public Resources Code (PRC) Chapter 2.6, Section 21083.2, and California Code of Regulations (CCR) Title 14, Chapter 3, Article 5, Section 15064.5.

Records Search

BCR Consulting LLC completed the cultural resources records search on March 11, 2024, at the South Central Coastal Information Center (SCCIC) using information on file at California State University, Fullerton. This archival research reviewed the status of all recorded historic and prehistoric cultural resources and survey and excavation reports completed within 0.5-mile of the Project Site. Additional resources reviewed include the Built Environment Resources Directory

(BERD) which consists of properties evaluated for or listed in the National Register of Historic Places (National Register), the California Register of Historical Resources (CRHR), lists of California Historical Landmarks, California Points of Historical Interest, and the Inventory of Historic Structures.

Field Survey

A pedestrian cultural resources field survey was conducted to locate and document previously recorded or new cultural resources, including archaeological sites, features, isolates, and historic-period buildings, that exceed 45 years in age within the Project Site. An intensive-level cultural resources field survey of the Project Site was conducted on March 25, 2024. The survey was conducted by walking parallel transects spaced approximately 15 meters apart across the entire Project Site, where accessible. Digital photographs were taken at various points within the Project Site. These included overviews as well as detail photographs of all cultural resources.

Thresholds of Significance

The following significance criteria are based on currently adopted guidance provided by Appendix G of the California Environmental Quality Act (CEQA) Guidelines. For the purposes of this report, an impact would be potentially significant if the Project results in or causes any one of the following:

- A substantial adverse change in the significance of a historical resource pursuant to § 15064.5.
- A substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.
- Disturbance to any human remains, including those interred outside of dedicated cemeteries.

As discussed in the Initial Study, provided in **Appendix A** of this EIR, and in **Section 6.0, Other CEQA Considerations**, the Project would have no impact related to historical resources. The existing office building is not listed in the National Register or CRHR, and the Project would not have a direct or indirect impact on historical resources. As such, no further analysis of this topic in this section is necessary.

Project Impacts

Threshold CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Impact CUL-2: Less than Significant Impact with Mitigation.

The Cultural Resources Assessment prepared for the Project Site indicates that the records search and field survey did not yield any cultural resources within the Project Site boundaries. Project Site conditions failed to indicate sensitivity for buried archaeological resources due to the Project Site's severely disturbed state associated with excavation, grading, and construction of the existing office building.

Additionally, a Sacred Lands File Search conducted with the NAHC resulted in positive findings. The NAHC recommended contacting the Gabrieleno/Tongva San Gabriel Band of Mission Indians for more information.

Construction activities for the Project would involve minimal demolition and excavation. However, earthwork activities could uncover previously known or unknown historical or archaeological resources. Implementation of **Mitigation Measure CUL-1, Inadvertent Discovery of Cultural Resource**, would provide a process for treatment of any archaeological resources inadvertently discovered during Project implementation. Implementation of Mitigation Measure CUL-1, requiring a cessation of construction activity, notification to the City, and consultation with a qualified archaeologist to evaluate the site and make the necessary findings, would reduce potential impacts to archaeological resources to less than significant.

Threshold CUL-3: Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Impact CUL-3: Less than Significant Impact with Mitigation.

As discussed in Threshold CUL-2 above, the Cultural Resources Assessment indicates that Project Site conditions failed to indicate sensitivity for buried archaeological resources due to the Project Site's severely disturbed state associated with excavation, grading, and construction of the existing office building.

Construction activities for the Project would involve minimal demolition and excavation. However, earthwork activities could uncover previously known or unknown human remains. Implementation of **Mitigation Measure CUL-2, Inadvertent Discovery of Human Remains**, requiring a cessation of construction activity until the County coroner can evaluate the discovery and made the necessary findings, would provide a process for treatment of any human remains inadvertently discovered during Project implementation. With implementation of this mitigation measure, impacts to human remains would be less than significant.

Cumulative Impacts

The geographic scope of the cumulative cultural resources analysis is the Project Site and surrounding area. Impacts to cultural resources are generally site-specific because the integrity of any specific cultural resource is often dependent upon the activities occurring in its immediate vicinity. As discussed in the Initial Study of this EIR, and **Section 6.0, Other CEQA Considerations**, the existing office building is not listed in the National Register or CRHR, and the Project would not have a direct or indirect impact on historical resources. Accordingly, the Project would not contribute cumulatively to impacts to historic resources.

Section 3.3, Cumulative Development, identifies no related projects within an approximately 1-mile radius of the Project Site that are planned, under construction, or have been recently completed. As discussed in discussion of Impact CUL-2 and Impact CUL-3, the Project would implement Mitigation Measures CUL-1 and CUL-2 and comply with applicable regulations pertaining to the inadvertent discovery and proper treatment of these resources. This would reduce any potential impacts to less than significant. Likewise, any projects in the City of Long Beach would be required to comply with applicable federal, State, and local regulations pertaining to these resources. As there are no cumulative projects identified within an approximately 1-mile radius of the Project Site, cumulative impacts related to Cultural Resources are less than significant.

Mitigation Measures

Mitigation Measure CUL-1, Inadvertent Discovery of Cultural Resources: In the event that any subsurface cultural resources are encountered at the Project Site during construction or the

course of any ground disturbance activities, all such activities within 50 feet of the discovery shall halt immediately. The applicant shall notify the City and consult with a Secretary of Interior qualified archaeologist who shall evaluate the find in accordance with federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. For any resources of Native American origin, the City shall also contact the Tribes that elected to consult on the Project to identify its potential as a Tribal Cultural Resource (TCR). Should the resource, in consultation between the City and Tribe(s), be determined a TCR, the City shall also consult with Tribes regarding avoidance, or other measures recommended by the consultant. All identified cultural resources will be recorded on appropriate CA DPR 523 series forms and evaluated for significance. All records will be submitted to the City of Long Beach, Consulting Tribe(s), and South-Central Coastal Information Center (SCCIC).

Mitigation Measure CUL-2, Inadvertent Discovery of Human Remains: If human remains are encountered during the undertaking, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.

Level of Significance After Mitigation

Project-specific and cumulative impacts related to cultural resources would be less than significant with implementation of **MM CUL-1** and **MM CUL-2**.

4.4 Energy

This section of the EIR addresses the potential impacts to energy associated with construction and operation of the Project. This discussion includes information regarding the regulatory setting, the environmental setting, and potential impacts to energy. Energy calculations are included as **Appendix D, Park Tower Student Housing Energy Analysis**.

4.4.1 Regulatory Setting

Relevant federal, State, and local energy-related laws and plans are summarized below.

Federal

Federal Energy Policy and Conservation Act and Corporate Average Fuel Economy Standards

In 1975, Congress enacted the Federal Energy Policy and Conservation Act, which established the first fuel economy standards, known as the Corporate Average Fuel Economy standards, for on-road motor vehicles in the United States. Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States. Pursuant to the act, the National Highway Traffic Safety Administration (NHTSA) is responsible for establishing additional vehicle standards. In 2012, new Corporate Average Fuel Economy (CAFE) standards for passenger cars and light trucks were approved for model years 2017 through 2021 (77 FR 62624–63200). In 2020, NHTSA and the U.S. Environmental Protection Agency (EPA) finalized amendments to the CAFE standards for model years 2021 through 2026 under the Safer Affordable Fuel-Efficient Vehicles Rule. Those amendments reduced the requirement for annual increases in efficiency from approximately 5 percent (as established in 2012) to approximately 1.5 percent. The Safer Affordable Fuel-Efficient Vehicles Rule also revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates for the State. However, in December 2021, NHTSA and EPA again revised the CAFE standards and GHG emissions standards for passenger cars and light trucks for model years 2023–2026, and reinstated California's authority to set its own standards. The final standards will achieve significant reductions in energy consumption and greenhouse gas (GHG) emissions within the transportation sector.

Energy Policy Act of 1992 and 2005

The Energy Policy Act of 1992 was passed to reduce the country's dependence on foreign petroleum and improve air quality. The act includes several parts intended to build an inventory of alternative fuel vehicles (AFVs) in large, centrally fueled fleets in metropolitan areas. The act requires certain federal, State, and local government and private fleets to purchase a percentage of light-duty AFVs capable of running on alternative fuels each year. In addition, financial incentives are also included in the act. Federal tax deductions are allowed for businesses and individuals to cover the incremental cost of AFVs. States are also required by the act to consider a variety of incentive programs to help promote AFVs. The Energy Policy Act of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act (EISA) of 2007 (Public Law 110-140) seeks to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. It also seeks to improve the energy performance of the federal government. The EISA sets increased Corporate Average Fuel Economy Standards; the Renewable Fuel Standard; appliance energy efficiency standards; building energy efficiency standards; and accelerated research and development tasks on renewable energy sources (e.g., solar energy, geothermal energy, and marine and hydrokinetic renewable energy technologies), carbon capture, and sequestration.

State

California Building Energy Efficiency Standards, Title 24, Part 6 (California Energy Code)

California's Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations (CCR) Title 24, Part 6) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The California Energy Commission (CEC) adopted the 2022 Energy Code on August 11, 2021, which was subsequently approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2022 Title 24 standards will result in less energy use, thereby reducing air pollutant emissions associated with energy consumption across California. For example, the 2022 Title 24 standards will require efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards.

California Green Building Standards Code

The California Green Building Standards Code (CCR, Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five green building areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary measures (CALGreen Tier 1 and Tier 2) that local governments may adopt to encourage or require additional measures in the five green building topics. The CEC approved the 2022 California Green Building Standards Code in September 2022 that went into effect on January 1, 2023.

California Code of Regulations Title 20 Appliance Efficiency Regulations

The appliance efficiency regulations (CCR, Title 20, Sections 1601-1608) include standards for new appliances. Twenty-three categories of appliances are included in the scope of these regulations. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

California 2007 Energy Action Plan Update

The 2007 Energy Action Plan II is the State's principal energy planning and policy document. The plan describes a coordinated implementation strategy to ensure that California's energy resources are adequate, affordable, technologically advanced, and environmentally sound. In accordance with this plan, the State and its electricity providers would invest first in energy efficiency and demand-side resources, followed by renewable resources, and only then in clean conventional electricity supply to meet its energy needs.

Clean Energy and Pollution Reduction Act of 2015

In October 2015, the legislature approved, and the Governor signed the Clean Energy and Pollution Reduction Act (SB 350), which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce Statewide GHG emissions:

Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.

Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the CEC, and local publicly owned utilities.

Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

Executive Order N-79-20 and Advanced Clean Cars II

On September 23, 2020, Governor Gavin Newsom issued Executive Order (EO) N-79-20, establishing the goal that 100 percent of in-state sales of new passenger cars and trucks be zero-emission by 2035 and charging California Air Resource Board (CARB) to develop the appropriate regulations to achieve this goal. On August 25, 2022, CARB approved the Advanced Clean Cars II rule, which codifies the goals set out in EO N-79-20 and establishes a year-by-year roadmap to meeting the goal by 2035. Under this regulation, automakers are required to accelerate deliveries of zero-emission light-duty vehicles, beginning with model year 2026. CARB estimates that between 2026 and 2040, the regulation would reduce GHG emissions by a cumulative 395 million metric tons, equivalent to reducing petroleum use by 915 million barrels.

Pavley Regulations and Fuel Efficiency Standards

California Assembly Bill (AB) 1493, enacted on July 22, 2002, required the CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks). Although aimed at reducing GHG emissions, specifically, a co-benefit of the Pavley standards is an improvement in fuel efficiency and consequently a reduction in fuel consumption.

Renewable Portfolio Standard

California's Renewable Portfolio Standard (RPS) (SB 1078), enacted in 2002, requires retail sellers of electric services to increase procurement from eligible renewable resources to 33 percent of total retail sales by 2020.

SB 1368

On September 29, 2006, Governor Arnold Schwarzenegger signed into law SB 1368 (Perata, Chapter 598, Statutes of 2006). The law limits long-term investments in baseload generation by the State's utilities to those power plants that meet an emissions performance standard jointly established by the CEC and the CPUC.

The CEC has designed regulations that:

- Establish a standard for baseload generation owned by, or under long-term contract to publicly owned utilities, of 1,100 pounds carbon dioxide (CO_2) per megawatt-hour. This would encourage the development of power plants that meet California's growing energy needs while minimizing their emissions of GHGs;
- Require posting of notices of public deliberations by publicly owned utilities on long-term investments on the CEC website. This would facilitate public awareness of utility efforts to meet customer needs for energy over the long-term while meeting the state's standards for environmental impact; and
- Establish a public process for determining the compliance of proposed investments with the emissions performance standard (EPS) (Perata, Chapter 598, Statutes of 2006).

Warren-Alquist Act

The California Legislature passed the Warren-Alquist Act in 1974, which gives statutory authority to the California Energy Commission (CEC). The legislation also incorporated the following three key provisions designed to address the demand side of the energy equation:

- It directed the CEC to formulate and adopt the nation's first energy conservation standards for both buildings constructed and appliances sold in California.
- It removed the responsibility of electricity demand forecasting from the utilities, which had a financial interest in high demand projections, and transferred it to the more impartial CEC.
- It directed the CEC to embark on an ambitious research and development program, with a particular focus on fostering what were characterized as "non-conventional energy sources."

100 Percent Clean Electric Grid

Signed on September 16, 2022, SB 1020 provides additional goals for the path to the 2045 goal of 100 percent clean electricity retail sales. It creates a target of 90 percent clean electricity retail sales by 2035 and 95 percent clean electricity retail sales by 2040.

Local

City of Long Beach Municipal Code

Section 21.45.400 of the Long Beach Municipal Code (LBMC) further regulates public and private development to include various standards that promote green buildings. A green building, also known as a sustainable building, is a structure that is designed, built, renovated, operated, or reused in an ecological and resource-efficient manner. Green buildings are designed to meet certain objectives such as protecting occupant health; improving employee productivity; using

energy, water and other resources more efficiently; and reducing the overall impact on the environment. The City of Long Beach recognizes the benefit of green buildings and establishes a green building program.

City of Long Beach Green Building Ordinance

City of Long Beach Green Building Ordinance On May 12, 2009, the Long Beach City Council approved Ordinance No. ORD- 09-0013 (Subsection 21.45.400—Green Building Standards for Public and Private Development). The following types of projects shall meet the intent of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program at the Certified level:

- A new residential or mixed use building of 50 dwelling units and 50,000 gross square feet or more.
- A new mixed use, or non-residential building of 50,000 square feet or more of gross floor area;
- The alteration of an existing residential or mixed use building that results in the addition of 50 dwelling units and 50,000 gross square feet or more;
- The alteration of an existing mixed use, or non-residential building that results in the expansion of 50,000 gross square feet or more; and
- A new construction or substantial rehabilitation project for which the City provides any portion of funding.

4.4.2 Environmental Setting

This section describes existing energy conditions in California. This includes a discussion of estimated total consumption and generation of electricity, consumption of natural gas, and transportation energy demand.

Electricity and Natural Gas

California's electricity industry is an organization of traditional utilities, private generating companies, and State agencies, each with a variety of roles and responsibilities to ensure that electrical power is provided to consumers. The California Independent Service Operator (ISO) is a nonprofit public benefit corporation that operates the State's wholesale power grid. ISO is charged with maintaining grid reliability and directing uninterrupted electrical energy supplies to California's homes and communities. While utilities still own transmission assets, the ISO routes electrical power along these assets, maximizing the use of the transmission system and its power generation resources. The ISO matches buyers and sellers of electricity to ensure that enough power is available to meet demand. To these ends, every five minutes the ISO forecasts electrical demands, accounts for operating reserves, and assigns the lowest cost power plant unit to meet demands while ensuring adequate system transmission capacities and capabilities.

ISO is charged with planning and coordinating grid enhancements to ensure that electrical power is provided to California consumers. To this end, utilities file annual transmission expansion/modification plans to accommodate the State's growing electrical needs. The ISO reviews and either approves or denies the proposed additions. In addition, the ISO works with other areas of the western United States electrical grid to ensure that adequate power supplies are available to the State.

State Energy Resources and Use California's diverse portfolio of energy resources produced approximately 7,359 trillion British thermal units (BTUs) in 2021.[1] According to the California Energy Commission, total electric generation for California in 2022 (the most recent year for which data are available) was approximately 287,220 gigawatt hours. California's non-carbon-dioxide-emitting electric generation categories, including nuclear, hydroelectric, and renewable generation, accounted for more than 54.2 percent of total in-state generation in 2021. California's in-State hydroelectric generation was approximately 17,612 gigawatt hours. Excluding offshore areas, the State ranked seventh in the nation in crude oil production in 2022 (the most recent year for which data are available), producing the equivalent of approximately 550 trillion BTUs. Other energy sources in the State include natural gas (2,173 trillion BTUs), nuclear (172 trillion BTUs), and biofuel (467 trillion BTUs).

Electricity is currently provided to the Project Site by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. Based on SCE's 2022 Power Content Label Mix, SCE derives electricity from varied energy resources including fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-State suppliers.

Table 4.4-1: SCE 2022 Power Content Mix, identifies the percentage of power generated by SCE in 2022 by energy resource.[2] The 2022 SCE power mix was 33.2 percent renewable energy. This includes 17percent solar, 9.8 percent wind power, 5.7 percent geothermal power, 0.5 percent hydroelectric, and 0.1 percent biomass & waste power. SCE's power mix using other resources includes 24.7 percent natural gas, 8.3 percent nuclear, 3.4 percent large hydroelectric, and 0.1 percent other sources. A total of 30.3 percent of SCE's power mix is derived from unspecified sources. SCE does not use coal to generate electricity.

Table 4.4-1: SCE 2022 Power Content Mix

Energy Resources	2022 SCE Power Mix
Eligible Renewable[1]	**33.2%**
Solar	17%
Wind	9.8%
Geothermal	5.7%
Eligible Hydroelectric	0.5%
Biomass & Waste	0.1%
Natural Gas	**24.7%**
Nuclear	**8.3%**
Large Hydroelectric	**3.4%**
Other	**0.1%**
Coal	**0.0%**
Unspecified Sources of power[2]	30.3%
Total	**100%**
Notes:	

[1] Energy Information Administration U.S. Energy Information Administration. *California State Energy Profile*. https://www.eia.gov/state/print.php?sid=CA#:~:text=In%202022%2C%20renewable%20resources%2C%20including,supplied%20almost%20all%20the%20rest. Accessed: August 2024.

[2] Southern California Edison (SCE). *2022 Power Content Label*. https://www.sce.com/sites/default/files/custom-files/PDF_Files/SCE_2022_Power_Content_Label_B%26W.pdf. Accessed July 2024.

Energy Resources	2022 SCE Power Mix
1. The eligible renewable percentage above does not reflect RPS compliance, which is determined using a different methodology. 2. Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources. Source: Southern California Edison, 2022 Power Content Label. https://www.sce.com/sites/default/files/custom-files/PDF_Files/SCE_2022_Power_Content_Label_B%26W.pdf. Accessed July 2024.	

The CPUC oversees utility purchases and transmission of natural gas to ensure reliable and affordable natural gas deliveries to existing and new consumers throughout the State. Natural gas is provided to the Project Site by the City of Long Beach Department of Energy Resources (Energy Resources). Energy Resources currently serves approximately 500,000 customers (155,000 accounts) in the cities of Long Beach and Signal Hill in addition to portions of Los Alamitos, Bellflower, Compton, and Los Angeles County.[3]

[3] City of Long Beach, *Energy Resources*, https://www.longbeach.gov/energyresources/ Accessed July 2024.

4.4.3 Impact Analysis

Methodology

The analysis used information from the CalEEMod Version 2022.1 outputs for the Park Tower Student Housing Project (included as **Appendix B**) to conduct an analysis of the Project's demands on energy (**Appendix D**). The analysis focused on Project related construction equipment energy demands, transportation energy demands, and Project energy demands.

In May 2022, the South Coast Air Management District (SCAQMD), in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the CalEEMod Version 2022.1. CalEEMod is used to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources as well as energy usage. Accordingly, the latest version of CalEEMod has been used to determine the Project's anticipated transportation and facility energy demands. Outputs from the annual model runs are provided in **Appendix B**.

On May 2, 2022, the EPA approved the 2021 version of the EMissions FACtor model (EMFAC2021) web database for use in State Implementation Plan and transportation conformity analyses. EMFAC2021 is a mathematical model that was developed to calculate emission rates, fuel consumption, vehicle miles traveled (VMT) from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources. The analysis utilized the different fuel types for each vehicle class from the annual EMFAC2021 emission inventory in order to derive the average vehicle fuel economy. This information was used to determine the estimated annual fuel consumption associated with vehicle usage during construction and operation of the Project. For purposes of analysis, the 2025 analysis years were utilized to determine the average vehicle fuel economy used throughout the duration of the Project. Outputs from the EMFAC2021 model run are provided in **Appendix B**.

Appendix F of the CEQA Guidelines, states that the means of achieving the goal of energy conservation includes the following:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on fossil fuels such as coal, natural gas, and oil; and
- Increasing reliance on renewable energy sources.

Per Appendix F of the CEQA Guidelines, "(i)n order to assure that energy implications are considered in project decisions, (CEQA) requires that EIRs include a discussion of the potential energy impacts of projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy (see Public Resources Code section 21100(b)(3))."

Thresholds of Significance

In compliance with Appendix G of the CEQA Guidelines, this report analyzes the Project's anticipated energy use during construction and operations to determine if the Project would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Project Impacts

Threshold ENG-1: Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact ENG-1: Less Than Significant Impact.

Construction

The energy consumption associated with the Project includes primarily diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips. The amount of electricity used during construction would be minimal; typical demand would stem from the use of electrically powered hand tools during the hours of construction activities.

Construction activity is anticipated to occur over a duration of 14 months, beginning as early as January 2025 and ending as early as March 2026. The energy associated with Project construction includes electricity use associated with water utilized for dust control, diesel fuel from on-road hauling trips, vendor trips, and off-road construction diesel equipment, as well as gasoline fuel from on-road worker commute trips. As Project construction would include negligible earthwork due to being an adaptive reuse of an existing building, electricity use during construction would be negligible and would not be quantified in the following discussion. Therefore, Project construction would not result in wasteful, inefficient, or unnecessary consumption of electricity resources. Additionally, because construction activities typically do not require natural gas, it is not included in the following discussion. Quantifications of construction energy are provided by the Project below; see **Table 4.4-2: Energy Use During Construction**.

Table 4.4-2: Energy Use During Construction [1]

Source	Total Construction Energy	Los Angeles County Annual Energy Consumption	Percentage Increase Countywide
Diesel Use	**Gallons**		
On-Road Construction Trips [2]	18,469	532,570,627	0.003%
Off-Road Construction Equipment[3]	30,439	532,570,627	0.006%
Gasoline Use	**Gallons**		
On-Road Construction Trips	5,757	3,536,229,368	<0.0005%

Notes:
1. Construction water use based on acres disturbed per day per construction sequencing and estimated water use per acre. Water use includes the energy required to convey water to and from the Project Site. The Project would not include site preparation or grading., therefore, electricity use would be negligible and would not be quantified.
2. On-road mobile fuel source based on vehicle miles traveled (VMT) from CalEEMod and fleet-average fuel consumption in gallons per mile from EMFAC2021 in Los Angeles for 2025.
3. Construction fuel use was calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry.

Source: Refer to the energy calculations in **Appendix D.**

Fuel

During Project construction, transportation energy use would depend on the type and numbers of trips, VMT, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would be from transport and use of construction equipment, delivery vehicles and

haul trucks, and construction employee vehicles that would use diesel fuel and gasoline. The use of energy resources by these vehicles would fluctuate according to the construction phase and would be temporary. Project construction would total approximately 48,909 gallons of diesel and 5,757 gallons of gasoline. As shown above in **Table 4.4-2,** the Project's fuel from the entire construction period would increase fuel use in the county by approximately 0.009 percent for diesel and less than 0.0005 percent for gasoline. Therefore, Project construction would not result in wasteful, inefficient, or unnecessary fuel consumption. Impacts would be less than significant, and no mitigation is required.

Operations

The energy consumption associated with Project operations would occur from building energy (electricity and natural gas) use, water use, and transportation-related fuel use. Annual energy use during Project operations is shown in **Table 4.4-3 Annual Energy Consumption During Operations.**

Table 4.4-3 Annual Energy Consumption During Operations

Source	Project Operational Usage	Los Angeles County Annual Energy Consumption	Percentage Increase Countywide
Electricity Use		**GWh**	
Total Electricity (Electricity Demand + Water Conveyance)	1.077	68,485	0.002
Natural Gas Use		**Therms**	
Area[1]	16,549	2,820,285,935	0.001
Diesel Use		**Gallons**	
Mobile[2]	6,664	622,405,362	0.001
Gasoline Use		**Gallons**	
Mobile[2]	66,551	3,557,629,353	0.002

Notes:
1. The electricity, natural gas, and water usage are based on Project-specific estimates and CalEEMod defaults.
2. Calculated based on the mobile source fuel based on vehicle miles traveled (VMT) and fleet-average fuel consumption (in gallons per mile) from EMFAC2021 for operational year 2027.
3. Annual Operational Energy represents the unmitigated operational from CalEEMod.

Source: Refer to the energy calculations in **Appendix D**.

Electricity

The Project's estimated operational electrical demand would total approximately 1.077 GWh per year. This would represent 0.002 percent increase of SCE's electricity demand, thus, would result in a negligible increased demand compared to SCE's overall demand. It is also noted that the Project (i.e., design and materials) would be subject to compliance with the 2022 Building Energy Efficiency Standards. The Project would also be required to comply with CALGreen, which establishes planning and design standards for sustainable site development, energy efficiency (more than California Energy Code requirements), water conservation, material conservation, and internal air contaminants. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary consumption of electrical resources.

Natural Gas

Southern California Gas Company (SoCalGas) provides natural gas to the Project area. Natural gas would be used at the Project Site. As shown above in **Table 4.4-3.** The Project's estimated operational natural gas demand would total approximately 16,549 therms per year. This would represent 0.001 percent of the natural gas consumption increase in the County, thus, would result in a negligible increase compared to the County's consumption.

Fuel

As shown in **Table 4.4-3**, during Project operations, diesel fuel consumption would be approximately 6,664 gallons per year. The Project would generate 1,695 daily trips based off the Project's Transportation Analysis. The existing office building on-site generates 1,188 daily trips. Thus, the Project's is anticipated to generate an additional 507 daily trips from existing conditions. As shown above in **Table 4.4-3**, the County's annual gasoline and diesel fuel use in 2027 is anticipated to be 3,557,629,353 and 622,405,362 gallons, respectively. Estimated Project operational gasoline and diesel fuel use would represent 0.002 and 0.001 percent of the County's gasoline and diesel use. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary fuel consumption. In addition, this analysis includes a conservative estimate of fuel usage. Future Project-operational energy would decrease as fuel usage would switch from gasoline and diesel to electricity per regulations.

Project operations would not substantially affect existing energy or fuel supplies or resources Further, the Project would be subject to compliance with applicable energy standards and new capacity would not be required. Therefore, the Project would result in a less than significant impact and no mitigation is required.

Threshold ENG-2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact ENG-2: Less Than Significant Impact

The following discussion evaluates the consistency of the Project with applicable federal, State and local plans relevant to energy and energy efficiency.

Consistency with Federal Energy Policy and Conservation Act and Corporate Average Fuel Economy Standards

In 1975, Congress enacted the Federal Energy Policy and Conservation Act, which established the first fuel economy standards, known as the Corporate Average Fuel Economy standards, for on-road motor vehicles in the United States. In 2020, NHTSA and the EPA finalized amendments to the CAFE standards for model years 2021 through 2026 under the Safer Affordable Fuel-Efficient Vehicles Rule. Those amendments reduced the requirement for annual increases in efficiency from approximately 5 percent (as established in 2012) to approximately 1.5 percent. The Safer Affordable Fuel-Efficient Vehicles Rule also revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates for the State. However, in December 2021, NHTSA and EPA again revised the CAFE standards and GHG emissions standards for passenger cars and light trucks for model years 2023–2026, and reinstated California's authority to set its own standards. The final standards will achieve significant reductions in energy consumption and GHG emissions within the transportation sector. The Project would be consistent with the Federal Energy Policy and Conservation Act and Corporate Fuel Economy Standards by utilizing fuel-efficient vehicles during Project construction. Therefore,

the Project would not interfere with implementation of the requirements of the Federal Energy Policy and Conservation Act and Corporate Average Fuel Economy Standards.

Energy Policy Act of 1992 and 2005

The Energy Policy Act of 1992 was passed to reduce the country's dependence on foreign petroleum and improve air quality. The Energy Policy Act of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy. The Energy Policy Act is not applicable as it is a federal incentive for renewable energy.

Consistency with Energy Independence and Security Act of 2007

The EISA of 2007 (Public Law 110-140) seeks to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. The Project would be consistent with the Energy Independence and Security Act of 2007 by complying with building energy efficiency standards. Therefore, the Project would not interfere with implementation of the Energy Independence and Security Act of 2007.

Consistency with California Code Title 24, Part 6, Energy Efficiency Standards

The 2022 version of Title 24 was adopted by the CEC and will become effective on January 1, 2023. The Project would be required to comply with the Title 24 standards in place at the time plan check submittals are made. Therefore, the Project would not result in a significant impact on energy resources and would not interfere with Title 24, Part 6.

Consistency with California Code Title 24, Part 11, CALGreen

As previously discussed, CCR, Title 24, Part 11: CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that were published on July 1, 2022 and went into effect on January 1, 2023. The Project would be required to comply with the applicable standards in place at the time plan check submittals are made.

Consistency with CCR Title 20 Appliance Efficiency Regulations

The appliance efficiency regulations (CCR Title 20, Sections 1601-1608) include standards for new appliances. Twenty-three categories of appliances are included in the scope of these regulations. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances. The Project would be required to comply with CCR Title 20 and would provide energy- and water-efficient appliances.

Consistency with California 2007 Energy Action Plan Update

The California 2007 Energy Action Plan Update describes a coordinated implementation strategy to ensure that California's energy resources are adequate, affordable, technologically advanced, and environmentally sound. In accordance with this plan, the State and its electricity providers would invest first in energy efficiency and demand-side resources, followed by renewable resources, and only then in clean conventional electricity supply to meet its energy needs. The

Project would be required to comply the 2007 Energy Action Plan by providing an energy efficient building design and investing in renewable energy.

Consistency with Clean Energy and Pollution Reduction Act of 2015 (SB 350)

The Clean Energy and Pollution Reduction Act (SB 350), requires the State to increase the amount of electricity procured from renewable energy, increase energy efficiency in existing buildings by 2030. The Project would be served by SCE, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. The Project would be designed and constructed to implement the energy efficiency measures for new residential developments and would include several additional measures designed to reduce energy consumption, including designs to offset 100 percent of electrical use with power generated by rooftop solar arrays. No feature of the Project would interfere with implementation of SB 350.

As shown above, the Project would not conflict with any of the State or local plans for renewable energy or energy efficiency. Accordingly, any impact would be less than significant.

Consistency with Executive Order N-79-20 and Advanced Clean Cars II

Executive Order N-79-20 and Advanced Clean Cars II is applicable as the Project would utilize light-duty vehicles during Project construction.

Consistency with Pavley Regulations and Fuel Efficiency Standards

California Assembly Bill (AB) 1493 is not applicable to the Project as it is a Statewide measure establishing vehicle emissions standards. No feature of the Project would interfere with implementation of the requirements under AB 1493.

Consistency with RPS

California's RPS is not applicable to the Project as it is a Statewide measure that establishes a renewable energy mix. No feature of the Project would interfere with implementation of the requirements under RPS.

Consistency with SB 1368

SB 1368 is not applicable to the Project as it is a Statewide measure that limits long-term investments in baseload generation by the State's utilities to those power plants that meet an emissions performance standard jointly established by the CEC and the CPUC.

Consistency with Warren-Alquist Act

The Warren-Alquist Act in 1974 is not applicable to the Project as it is a Statewide measure which gives statutory authority to the California Energy Commission (CEC). to address the demand side of the energy equation:

Consistency with 100 Percent Clean Electric Grid

SB 1020 is not applicable to the Project as it is a Statewide measure which provides additional goals for the path to the 2045 goal of 100 percent clean electricity retail sales.

City of Long Beach Municipal Code

Section 21.45.400 of the Long Beach Municipal Code (LBMC) further regulates public and private development to include various standards that promote green buildings.

City of Long Beach Green Building Ordinance

The Long Beach City Council approved Ordinance No. ORD- 09-0013 (Subsection 21.45.400—Green Building Standards for Public and Private Development) requires that new residential or mixed-use buildings of 50 dwelling units and 50,000 gross square feet be LEED certified. The Project would be LEED Certified and not conflict with the Green Building Ordinance.

Cumulative Impacts

Section 3.3, Cumulative Development identifies no related projects within an approximately 1-mile radius of the Project Site that are planned, under construction, or have been recently completed. However, the geographic context for cumulative analysis of energy is the City of Long Beach and the State of California, the bodies that have produced plans for renewable energy and/or energy efficiency.

Potential cumulative impacts would occur if the Project in combination with the cumulative projects would result in significant effects to Energy. Similar to the Project, the cumulative projects would be required to comply with applicable state or local plans for renewable energy or energy efficiency, including Title 24 Energy Efficiency Standards and CALGreen. Compliance with these standards in cumulative project design would ensure that cumulative impacts associated with State or local energy plans would be less than significant.

As regards consumption of energy resources construction and operation of the Project would require use of fuel and electricity that would represent a minute percentage of overall energy demand in the State. Similarly, the cumulative projects would not be anticipated to produce a significant impact due to wasteful inefficient, or unnecessary consumption of energy during construction. Accordingly, cumulative energy impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Project-specific and cumulative impacts related to energy would be less than significant.

4.5 Geology and Soils

This section of the EIR describes the existing setting of the Project Site as it relates paleontological resources; identifies applicable regulatory conditions and requirements; presents the criteria used to evaluate potential impacts on paleontological resources; and identifies measures to reduce or avoid significant impacts. The evaluation of paleontological resources is based on the Cultural Resources Assessment prepared by BCR Consulting LLC on May 23, 2024 contained in **Appendix C**, **Cultural Resources Assessment.**

4.5.1 Regulatory Setting

Federal

Society for Vertebrate Paleontology Standard Guidelines

Palaeontologic resources are considered to be older than recorded history and/or older than 5,000 years BP [before present]. The Society for Vertebrate Paleontology (SVP) has established standard guidelines[1] that outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation. The Paleontological Resources Preservation Act (PRPA) of 2009 calls for uniform policies and standards that apply to fossils on all federal public lands. All federal land management agencies are required to develop regulations that satisfy the stipulations of the PRPA. As defined by the SVP[2], significant paleontological resources are:

> Fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i. e., older than about 5,000 radiocarbon years).

Based on the significance definition of the SVP[3], all identifiable vertebrate fossils are considered to have significant scientific value. This position is adhered to because vertebrate fossils are relatively uncommon, and only rarely will a fossil locality yield a statistically significant number of specimens of the same genus. Therefore, every vertebrate fossil found has the potential to provide significant new information on the taxon it represents, its paleoenvironment, and/or its distribution. Furthermore, all geologic units in which vertebrate fossils have previously been found are considered to have high sensitivity. This is because paleontological sites indicate that the containing rock unit or formation is fossiliferous. Therefore, the limits of the entire rock unit, both areal and stratigraphic, define the extent of paleontological potential. Identifiable plant and invertebrate fossils are considered significant if found in association with vertebrate fossils or if defined as significant by project paleontologists, specialists, or local government agencies.

[1] Society of Vertebrate Paleontology, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010
[2] Society of Vertebrate Paleontology, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010.
[3] Society of Vertebrate Paleontology, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010.

State

California Penal Code Section 622.5

California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor."

Public Resources Code Section 5097.5

Requirements for paleontological resource management are included in PRC Division 5, Chapter 1.7, Section 5097.5, and Division 20, Chapter 3, Section 30244, which state:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

These statutes prohibit the removal, without permission, of any paleontological site or feature from lands under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, local agencies are required to comply with PRC Section 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. Public Resources Code Section 5097.5 also establishes the removal of paleontological resources as a misdemeanor and requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (state, county, city, and district) lands.

Local

City of Long Beach General Plan

The Land Use Element of the Long Beach General Plan includes goals, policies, and directions to achieve the City's vision of the community and future development.[4] The General Plan includes 11 elements that have been updated at various points between 1966 and 2023. The elements focus on: Air Quality, Conservation, Historic Preservation, Housing, Land Use, Mobility, Noise, Open Space and Recreation, Public Safety, Seismic Safety, and Urban Design.

The following policies apply to the Project.

Land Use Element

Natural Resource Protection Policy 2: 1.1: Minimize any potential impacts to unknown paleontological resources by ensuring appropriate treatment and documentation of the discovery in accordance with federal, State, and local guidelines.

Paleontological Resources

The City's General Plan does not identify areas with potential paleontological resources. The Project Site is located within a highly urbanized area of the city. According to the Cultural

[4] City of Long Beach, Long Beach General Plan, https://www.longbeach.gov/lbds/planning/advance/general-plan/. Accessed June 9, 2024.

Resources Assessment prepared by BCR Consulting LLC on May 23, 2024, the geologic units underlying the Project Site are mapped as old shallow marine deposits from the Pleistocene epoch, with surrounding units of Holocene epoch sediment. Pleistocene units are considered to be highly paleontologically sensitive. Any excavation activity associated with the development of the Project Site would potentially impact paleontologically sensitive Pleistocene alluvial units.

4.5.2 Environmental Setting

The Cultural Resources Assessment Report prepared for the Project Site was completed in May 2024 by BCR Consulting, LLC, and is included in **Appendix C**. The following sections include a summary of description of the environmental setting as provided in **Appendix C**.

Existing Conditions

The Project Site is currently developed with a seven-story office building and three levels of subterranean parking built in 1981. The existing office building is approximately 120,000 sf of which 109,600 sf is currently leased (as of January 2024). The western side of the Project Site adjacent to Clark Avenue includes a surface parking lot, driveway, and landscaping. The Project Site is bounded by the Pacific Coast Highway to the north and east, East Anaheim Street to the south, and Clark Avenue to the west. There is signage for the existing office building on the northern corner of the Project Site along Pacific Coast Highway. The Project Site is surrounded by commercial, office, residential, and religious uses to the north and east past the Pacific Coast Highway; Recreational Park Golf Course 18 to the south; and commercial and residential uses to the west.

Natural Setting

The local geologic region coincides with the physiographic area known as the Los Angeles Basin. It is characterized as a transverse-oriented lowland basin and coastal plain approximately 50 miles long and 20 miles wide. The basin originated as a deep marine trough during the Pliocene (7-2 million years ago) that eventually filled with shallow water fossil bearing sediments. By the beginning of the Pleistocene (after 2 million years ago) uplifting created the series of plains and mesas along the coast that now characterize the area. Local vegetation communities are naturally dominated by coastal sage scrub and riparian vegetation, although urbanization prevents its proliferation in much of the region. Excavation for building construction on the Project Site have disturbed sediments to unknown depths.

The geologic units underlying the Project Site are mapped as old shallow marine deposits from the Pleistocene epoch, with surrounding units of Holocene epoch sediment. Pleistocene units are considered to be highly paleontologically sensitive.

4.5.3 Impact Analysis

Methodology

Potential direct and indirect Project impacts were identified based on a review of the Cultural Resources Assessment prepared by BCR Consulting LLC on May 23, 2024.

Records Search

To address potential impacts to paleontological resources, a paleontological records search was conducted by the Western Center Museum. The results of the paleontological records search

conducted by Western Science Center were received on April 17, 2024, which indicated that there are no mapped localities within the Project area or within a 1-mile radius.

However, as noted by the Western Science Center, a fossil specimen that could be discovered from the Project area would be potentially scientifically significant.

Thresholds of Significance

- An impact is considered significant if the Project would:
    - Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

As discussed in the Initial Study, provided in **Appendix A** of this EIR, and in **Section 6.0, Other CEQA Considerations**, the Project would have no impact or less than significant impacts related to geology and soils. This section only addresses potential impacts to paleontological resources as discussed below. As determined by the Initial Study, the Project would have no impact in regard to the rapture of a known earthquake line, ground failure and liquefaction, landslides, lateral spreading, subsidence, liquefaction or collapse, expansive soils, and soils incapable of supporting the use of septic tanks or alternative wastewater disposal systems. Furthermore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking or result in substantial soil erosion or the loss of topsoil. As such, impacts with respect to seismic ground shaking and soil erosion or the loss of topsoil would be less than significant, and no further analysis is required.

Project Impacts

Threshold GEO-6: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact GEO-6: Less Than Significant with Mitigation.

The Project is situated in a highly urbanized environment and there are no unique geologic features located on or around the Project Site.

The Project Site is currently fully developed and is highly disturbed. According to the Cultural Resources Assessment prepared by BCR Consulting LLC on May 23, 2024, the Project Site is underlain by old shallow marine deposits from the Pleistocene epoch, with surrounding units of Holocene epoch sediment. Pleistocene units are considered to be highly paleontologically sensitive. Excavation activity associated with the development of the Project Site would impact the paleontologically sensitive Pleistocene alluvia units. However, excavation of the Project Site would be minimal due to the adaptive reuse of the existing structure.

To reduce a potential impact to a paleontological resource, the Project would implement Mitigation Measure GEO-1 which would require paleontological monitoring and GEO-2, which would be require salvaging and cataloguing of fossils. In the event paleontological resources are encountered during construction of the Project, the City shall be immediately informed of the discovery. All work shall cease in the area of the find, and a qualified paleontologist shall be retained by the Applicant to evaluate the find before restarting work in the area. The City shall require that all paleontological resources identified on the Project Site be assessed and treated in a manner determined by the qualified paleontologist. The qualified paleontologist shall be empowered to halt or divert ground disturbing activities. Collected resources shall be salvaged and curated into the permanent collections of a museum repository.

With implementation of Mitigation Measure GEO-1, Paleontological Monitoring and GEO-2, Paleontological Documentation impacts would be less than significant.

Cumulative Impacts

Section 3.3, Cumulative Development identifies no related projects within an approximately 1-mile radius of the Project Site that are planned, under construction, or have been recently completed. However, for purposes of the cumulative analysis, the geographic area would be the City of Long Beach. Potential cumulative impacts would occur if the Project in combination with projects in the City of Long Beach would result in significant effects to Geology and Soils (paleontological resources).

As discussed above, the Project is required to comply with the **Mitigation Measure GEO 1, Paleontological Monitoring** and **Mitigation Measure GEO-2 Paleontological Documentation**, thus ensuring that impacts to paleontological resources from the Project would be less than significant. Likewise, any projects in the City of Long Beach would be required to comply with applicable federal, State, and local regulations pertaining to these resources. As there are no cumulative projects identified within an approximately 1-mile radius of the Project Site, cumulative impacts related to Cultural Resources are less than significant.

Mitigation Measures

Mitigation Measure GEO-1, Paleontological Monitoring. In the event paleontological resources are encountered during construction of the Project, the City shall be immediately informed of the discovery. All work shall cease in the area of the find, and a qualified paleontologist shall be retained by the Applicant to evaluate the find before restarting work in the area. A qualified paleontologist is a paleontologist who meets the Society of Vertebrate Paleontology (SVP) standards for Qualified Professional Paleontologist, which is defined as an individual preferably with an M.S. or Ph.D. in paleontology or geology, who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California (preferably Southern California), and who has worked as a paleontological mitigation Project supervisor for a least one year. The City shall require that all paleontological resources identified on the Project Site be assessed and treated in a manner determined by the qualified paleontologist. The qualified paleontologist shall be empowered to halt or divert ground disturbing activities.

Mitigation Measure GEO-2, Paleontological Documentation. Fossil remains collected during the monitoring process will be salvaged and will be cleaned, repaired, sorted, and catalogued. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, will be deposited (as a donation) in a scientific institution with permanent paleontological collections located within the County (or, if no repository is available, adjacent Counties). A final data recovery report will be completed by a qualified paleontologist. This report will include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils. The report will be submitted to the Lead Agency upon completion.

Level of Significance After Mitigation

Project-specific and cumulative impacts related to geology and soils (paleontological resources) would be less than significant.

4.6 Greenhouse Gas Emissions

This section of the Draft EIR analyzes potential greenhouse gas emissions impacts associated with the construction and operation of the Project. The information in this section is summarized from the detailed greenhouse gas emissions analysis, **Park Tower Student Housing Air Quality and Greenhouse Gas Emissions Analysis**, included as **Appendix B, Park Tower Student Housing Air Quality and Greenhouse Gas Analysis**.

4.6.1 Regulatory Setting

Federal

Federal Clean Air Act

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address GHGs. The federal government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency, renewable energy, methane and other non-carbon dioxide gases, agricultural practices, and implementation of technologies to achieve GHG reductions. USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the ENERGY STAR® labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

In *Massachusetts v. Environmental Protection Agency* (Docket No. 05–1120), the United States Supreme Court held in April of 2007 that the USEPA has statutory authority under Section 202 of the Clean Air Act (CAA) to regulate GHGs. The Court did not hold that the USEPA was required to regulate GHG emissions; however, it indicated that the agency must decide whether GHGs cause or contribute to air pollution that is reasonably anticipated to endanger public health or welfare. On December 7, 2009, the USEPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the CAA. The USEPA adopted a Final Endangerment Finding for the six defined GHGs on December 7, 2009. The Endangerment Finding is required before USEPA can regulate GHG emissions under Section 202(a)(1) of the CAA consistently with the United States Supreme Court decision. The USEPA also adopted a Cause or Contribute Finding in which the USEPA Administrator found that GHG emissions from new motor vehicle and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. These findings do not, by themselves, impose any requirements on industry or other entities. However, these actions were a prerequisite for implementing GHG emissions standards for vehicles.

Mandatory Reporting of GHGs

The Consolidated Appropriations Act of 2008, passed in December 2007, requires the establishment of mandatory GHG reporting requirements. On September 22, 2009, the EPA issued the Final Mandatory Reporting of GHGs Rule, which became effective January 1, 2010. The rule requires reporting of GHG emissions from large sources and suppliers in the U.S. and is intended to collect accurate and timely emissions data to inform future policy decisions. Under the rule, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons per year or more of GHG emissions are required to submit annual reports to the USEPA.

State

AB 32

The State Legislature enacted AB 32, which required that GHGs emitted in California be reduced to 1990 levels by the year 2020 (this goal has been met). GHGs as defined under AB 32 include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorochemicals (PFCs), and sulfur hexafluoride (SF_6). Since AB 32 was enacted, a seventh chemical, nitrogen trifluoride (NF_3), has also been added to the list of GHGs. CARB is the state agency charged with monitoring and regulating sources of GHGs. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 states the following:

"Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems."

SB 375

On September 30, 2008, SB 375 was signed by Governor Schwarzenegger. According to SB 375, the transportation sector is the largest contributor of GHG emissions, which emits over 40 percent of the total GHG emissions in California. SB 375 states, "Without improved land use and transportation policy, California would not be able to achieve the goals of AB 32." SB 375 does the following: it (1) requires metropolitan planning organizations (MPOs) to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, (2) aligns planning for transportation and housing, and (3) creates specified incentives for the implementation of the strategies.

SB 375 requires MPOs to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while considering the transportation, housing, environmental, and economic needs of the region. SB 375 uses California Environmental Quality Act (CEQA) streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. Although SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.

Concerning CEQA, SB 375, as codified in Public Resources Code Section 21159.28, states that CEQA findings for certain projects are not required to reference, describe, or discuss (1) growth inducing impacts, or (2) any project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network, if the project:

- Is in an area with an approved sustainable communities strategy or an alternative planning strategy that CARB accepts as achieving the GHG emission reduction targets.
- Is consistent with that strategy (in designation, density, building intensity, and applicable policies).
- Incorporates the MMs required by an applicable prior environmental document.

SB 350

In October 2015, the State Legislature approved, and Governor Jerry Brown signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the Renewables Portfolio Standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for EV charging stations. Provisions for a 50 percent reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.
- Double the energy efficiency in existing buildings by 2030. This target would be achieved through the California Public Utilities Commission (CPUC), the CEC, and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which would facilitate the growth of renewable energy markets in the western United States.

SB 32

On September 8, 2016, Governor Brown signed SB 32 and its companion bill, AB 197. SB 32 requires the state to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80 percent below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the State Legislature.

2017 CARB Scoping Plan

In November 2017, CARB released the Final 2017 Scoping Plan Update (2017 Scoping Plan), which identifies the State's post-2020 reduction strategy. The 2017 Scoping Plan reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard (LCFS), and much cleaner cars, trucks, and freight movement, utilizing cleaner, renewable energy, and strategies to reduce CH_4 emissions from agricultural and other wastes. The 2017 Scoping Plan established an emissions limit of 260 million metric tons of CO_2 equivalent ($MTCO_2e$) for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

Note, however, that the 2017 Scoping Plan acknowledges that:

> "[a]chieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA."

The 2017 Scoping Plan also identifies local governments as essential partners in achieving the State's long-term GHG reduction goals and identifies local actions to reduce GHG emissions. As part of the recommended actions, CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 $MTCO_2e$ or less per capita by 2030 and 2 $MTCO_2e$ or less per capita by 2050. For CEQA projects, CARB states that lead agencies may develop evidence-based bright-line numeric thresholds – consistent with the 2017 Scoping Plan and the State's long-term GHG goals – and projects with emissions over that amount may be required to incorporate onsite design features and mitigation measures that avoid or minimize project emissions to the degree feasible; or a performance-based metric using a climate action plan (CAP) or other plan to reduce GHG emissions is appropriate.

2022 CARB Scoping Plan

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with CEQA Guidelines Section 15183.5. The key elements of the 2022 CARB Scoping Plan focus on transportation - the regulations that will impact this sector are adopted and enforced by CARB on vehicle manufacturers and outside the jurisdiction and control of local governments.

Cap-and-Trade Program

The 2022 Scoping Plan identifies a Cap-and-Trade Program as one of the key strategies for California to reduce GHG emissions. According to CARB, a cap-and-trade program would help put California on the path to meet its goal of achieving a 40 percent reduction in GHG emissions from 1990 levels by 2030. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap would be able to trade permits to emit GHGs within the overall limit.

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from regulated entities by more than 16 percent between 2013 and 2020, and by an additional 40 percent by 2030. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and would decline over time, achieving GHG emission reductions throughout the program's duration.

The Cap-and-Trade Program covers approximately 80 percent of California's GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported.

Executive Orders Related to GHG Emissions

Executive Order S-3-05

California Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following reduction targets for GHG emissions:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that would stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an executive order, the goals are not legally enforceable for local governments or the private sector.

Executive Order S-01-07

Governor Schwarzenegger signed Executive Order S-01-07 on January 18, 2007. The order mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. CARB adopted the LCFS on April 23, 2009. In 2018, CARB approved amendments to the regulation, which included strengthening the carbon intensity benchmarks through 2030 in compliance with the SB 32 GHG emissions reduction target for 2030. The amendments included crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector.

Executive Order S-13-08

Executive Order S-13-08 states that "climate change in California during the next century is expected to shift precipitation patterns, accelerate sea level rise and increase temperatures, thereby posing a serious threat to California's economy, to the health and welfare of its population and to its natural resources." Pursuant to the requirements in the Order, the 2009 California Climate Adaptation Strategy was adopted, which is the "…first statewide, multi-sector, region-specific, and information-based climate change adaptation strategy in the United States." Objectives include analyzing risks of climate change in California, identifying, and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order B-30-15

On April 29, 2015, Governor Brown issued an executive order to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. The Governor's executive order aligned California's GHG reduction targets with those of leading international governments ahead of the United Nations Climate Change Conference in Paris late 2015. The Order sets a new interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030 in order to ensure California meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050. The Order also requires the state's climate adaptation plan to be updated every three years, and for the State to continue its climate change research program, among other provisions. As with Executive Order S-3-05, this Order is not legally enforceable as to local governments and the private sector. Legislation that would update AB 32 to make post 2020 targets and requirements a mandate is in process in the State Legislature.

Executive Order B-55-18 and SB 100

SB 100 and Executive Order B-55-18 were signed by Governor Brown on September 10, 2018. Under the existing RPS, 25 percent of retail sales of electricity are required to be from renewable sources by December 31, 2016, 33 percent by December 31, 2020, 40 percent by December 31, 2024, 45 percent by December 31, 2027, and 50 percent by December 31, 2030. SB 100 raises California's RPS requirement to 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55- 18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the California Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

Executive Order N-79-20 and Advanced Clean Cars II

On August 25, 2022, CARB approved the Advanced Clean Cars II rule, which codifies the goals set out in Executive Order N-79-20 and establishes a year-by-year roadmap such that by 2035, 100 percent of new cars and light trucks sold in California will be zero-emission vehicles. Under this regulation, automakers are required to accelerate deliveries of zero-emission light-duty vehicles, beginning with model year 2026. CARB estimates that the regulation would reduce GHG emissions from light-duty vehicles by 50 percent by 2040, and that from 2026 to 2040, GHG emissions would be reduced by a cumulative 395 million metric tons.

California Regulations and Building Codes

Title 20 CCR Sections 1601 Et. Seq. – Appliance Energy Regulations

The Appliance Efficiency Regulations regulate the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. Twenty-three categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles or other mobile equipment.

Title 24 CCR Part 6 - California Energy Code

The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods.

Title 24 CCR Part 11 – California Green Building Standards Code

CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings

that went in effect on August 1, 2009, and is administered by the California Building Standards Commission.

CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective on January 1, 2023. The CEC anticipates that the 2022 California Energy Code will provide 1.5 billion dollars in consumer benefits and reduce GHG emissions by 10 million metric tons. The Project would be required to comply with the applicable standards in place at the time plan check submittals are made. These require, among other items:

Nonresidential Mandatory Measures

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- Designated parking for clean air vehicles. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106.5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics,

organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).

- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
    - Water closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1).
    - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
    - Showerheads. Single showerheads shall have a maximum flow rate of not more than 1.8 gallons per minute and 80 pounds per square inch (psi) (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
    - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- Outdoor potable water uses in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current DWR's Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 square feet or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (5.303.1.1 and 5.303.1.2).
- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 square feet. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 square feet requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 square feet and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

CARB Refrigerant Management Program

CARB adopted a regulation in 2009 to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is set forth in Sections 95380 to 95398 of Title 17 of the CCR. The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with refrigeration systems with more than 50 pounds of a high global warming potential (GWP)

refrigerant. The refrigerant management program is designed to (1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and (3) verify GHG emission reductions.

suggests a similar rollback of Phase 2 standards for MDT and HDT vehicles may be pursued.

SB 97 and the CEQA Guidelines Update

Passed in August 2007, SB 97 added Section 21083.05 to the Public Resources Code. The code states "(a) On or before July 1, 2009, the Office of Planning and Research (OPR) shall prepare, develop, and transmit to the Resources Agency guidelines for the mitigation of GHG emissions or the effects of GHG emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption. (b) On or before January 1, 2010, the Resources Agency shall certify and adopt guidelines prepared and developed by the OPR pursuant to subdivision (a)."

In 2012, Public Resources Code Section 21083.05 was amended to state:

> "The Office of Planning and Research and the Natural Resources Agency shall periodically update the guidelines for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption, to incorporate new information or criteria established by the State Air Resources Board pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code."

On December 28, 2018, the Natural Resources Agency announced the OAL approved the amendments to the CEQA Guidelines for implementing CEQA. The CEQA Amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents. The CEQA Amendments fit within the existing CEQA framework by amending existing CEQA Guidelines to reference climate change.

Section 15064.4 was added the CEQA Guidelines and states that in determining the significance of a project's GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively insignificant compared to statewide, national, or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. Additionally, a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently consider the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use.

Regional

The Project Site is within the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

SCAQMD

SCAQMD is the agency responsible for air quality planning and regulation in the SCAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions.

At this time, it is unknown if the Project would include stationary sources of emissions subject to SCAQMD permits. Notwithstanding, if the Project requires a stationary permit, it would be subject to the applicable SCAQMD regulations.

SCAQMD Regulation XXVII, adopted in 2009, includes the following rules:

- Rule 2700 defines terms and post global warming potentials.
- Rule 2701, SoCal Climate Solutions Exchange, establishes a voluntary program to encourage, quantify, and certify voluntary, high quality certified GHG emission reductions in the SCAQMD.
- Rule 2702, GHG Reduction Program created a program to produce GHG emission reductions within the SCAQMD. The SCAQMD would fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

Local

City of Long Beach Sustainable City Action Plan (SCAP)

The City of Long Beach adopted SCAP in February 2010. The SCAP identifies a wide range of measures potentially applicable to discretionary development that include energy conservation, water use reduction, address global warming, improve pedestrian options, transportation management and solid waste recycling. Specific goals related to GHG include reducing electricity use in city operations by 25 percent and community operations by 15 percent by 2020. Although Project plans have not yet been developed to identify specific Project features that would support reductions in electrical usage, adjustments were made to the California Emissions Estimator Model (CalEEMod) modeling to represent that the Project would comply with the 2022 California Building Standards Code (2022 CCR Title 24).

City of Long Beach Climate Action Plan (CAP)

The CAP provides a framework for the City to reduce community wide GHG emissions and comply with state regulations (i.e., SB 32), and to also address the effects of climate change on the community. Under the CAP, the City aims to achieve a per SP emissions target of 3.04 $MTCO_2e$ per SP for year 2030, which would coincide with the emissions reduction target established under SB 32. To achieve this target, the City would be required to reduce emissions by 192,659 $MTCO_2e$ relative to the BAU emissions forecast for year 2030. In addition to the year 2030 target, the CAP also includes a long-term net carbon neutrality goal for year 2045. This goal would require a reduction in GHG of 1,513,047 $MTCO_2e$. To meet the 2030 reduction target, the CAP includes 21 mitigation actions covering the transportation, building energy, and waste sectors. Full implementation of these mitigation actions would reduce emissions in the transportation, building energy, and waste sectors by 8 percent, 68 percent, and 24 percent, respectively. In addition to

mitigation actions, the CAP also includes 40 various adaptation actions that addresses extreme heat, air quality, drought, and sea level rise and flooding. The City approved the CAP on August 16, 2022.

The City's CAP is intended to be utilized for purposes of GHG streamlining and to satisfy the requirements needed under CEQA Guidelines Section 15183 to be considered a qualified GHG reduction plan. Because the CAP includes a baseline emissions inventory and projects future emissions, identifies a community-wide reduction target, identifies strategies and measures to meet the reduction target, monitors the effectiveness of reduction measures, and was adopted in a public process subject to environmental review, the CAP is consistent with the requirements of CEQA Guidelines Section 15183 and is a qualified GHG reduction plan.[1]

4.6.2 Environmental Setting

Greenhouse Gases and Climate Change

Certain gases in the earth's atmosphere classified as GHGs play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of a GHG molecule is dependent on multiple variables and cannot be pinpointed, more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms of carbon sequestration. Of the total annual human-caused CO_2 emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO_2 emissions remains stored in the

[1] Long Beach Climate Action Plan, Adopted in August 2022. https://www.longbeach.gov/globalassets/lbcd/media-library/documents/planning/lb-cap/adopted-lb-cap_-aug-2022. Accessed August 1, 2024.

atmosphere.[2] **Table 4.6-1: Description of Greenhouse Gases** describes the primary GHGs attributed to global climate change, including their physical properties.

Table 4.6-1: Description of Greenhouse Gases

Greenhouse Gas	Description
Carbon Dioxide (CO_2)	CO_2 is a colorless, odorless gas that is emitted naturally and through human activities. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood. The largest source of CO_2 emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. The atmospheric lifetime of CO_2 is variable because it is readily exchanged in the atmosphere. CO_2 is the most widely emitted GHG and is the reference gas (Global Warming Potential of 1) for determining Global Warming Potentials for other GHGs.
Nitrous Oxide (N_2O)	N_2O is largely attributable to agricultural practices and soil management. Primary human-related sources of N_2O include agricultural soil management, sewage treatment, combustion of fossil fuels, and adipic and nitric acid production. N_2O is produced from biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N_2O is approximately 120 years. The Global Warming Potential of N_2O is 298.
Methane (CH_4)	CH_4, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Methane is the major component of natural gas, about 87 percent by volume. Human-related sources include fossil fuel production, animal husbandry, rice cultivation, biomass burning, and waste management. Natural sources of CH_4 include wetlands, gas hydrates, termites, oceans, freshwater bodies, non-wetland soils, and wildfires. The atmospheric lifetime of CH_4 is about 12 years and the Global Warming Potential is 25.
Hydrofluorocarbons (HFCs)	HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is increasing, as the continued phase out of CFCs and HCFCs gains momentum. The 100-year Global Warming Potential of HFCs range from 124 for HFC-152 to 14,800 for HFC-23.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Global Warming Potentials range from 6,500 to 9,200.
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. They are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. The Montreal Protocol on Substances that Deplete the Ozone Layer prohibited their production in 1987. Global Warming Potentials for CFCs range from 3,800 to 14,400.

[2] Intergovernmental Panel on Climate Change, *Carbon and Other Biogeochemical Cycles. In: Climate Change 2013: The Physical Science Basis*, *Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2013. http://www.climatechange2013.org/ images/report/WG1AR5_ALL_FINAL.pdf. Accessed August 2024.

Greenhouse Gas	Description
Sulfur Hexafluoride (SF_6)	SF_6 is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas. The Global Warming Potential of SF_6 is 23,900.
Hydrochlorofluorocarbons (HCFCs)	HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, HCFCs are subject to a consumption cap and gradual phase out. The United States is scheduled to achieve a 100 percent reduction to the cap by 2030. The 100-year Global Warming Potentials of HCFCs range from 90 for HCFC-123 to 1,800 for HCFC-142b.
Nitrogen Trifluoride (NF_3)	NF_3 was added to Health and Safety Code §38505(g)(7) as a GHG of concern. This gas is used in electronics manufacture for semiconductors and liquid crystal displays. It has a high global warming potential of 17,200.
Sources: Compiled from U.S. EPA, Overview of Greenhouse Gases, (https://www.epa.gov/ghgemissions/overview-greenhouse-gases), accessed 12-30-2020; U.S. EPA, Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016, 2018; Intergovernmental Panel on Climate Change, Climate Change 2007: The Physical Science Basis, 2007; National Research Council, Advancing the Science of Climate Change, 2010; U.S. EPA, Methane and Nitrous Oxide Emission from Natural Sources, April 2010.	

4.6.3 Impact Analysis

Methodology

The Project has the potential to affect GHGs through construction-source and operational-source emissions. Emissions associated with the Project were calculated using the latest version of the California Emissions Estimator Model (CalEEMod) version 2022.1.The purpose of CalEEMod is to calculate construction-source and operational-source criteria pollutants (VOCs, NO_X, SO_X, CO, PM10, and PM2.5) and GHG emissions from direct and indirect sources, and to quantify applicable air quality and GHG reductions achieved from mitigation measures. The output from the model runs for both construction and operational activity are provided in **Appendix B**.

Construction Emissions

Calculation of construction-related emissions is based on activities associated with construction of the Project. Construction activities would include demolition/crushing of the existing interior structures and surfaces, building construction, and the application of architectural coating. CalEEMod was utilized to calculate GHG emissions resulting from use of construction equipment during the phases of activities as well as on-road vehicle emissions from vehicle usage for construction workers, vendor trucks, and haul trucks traveling to and from the site. CalEEMod defaults for vendor trips were adjusted based on a ratio of the total vendor trips to the number of days of each subphase of construction.

Construction equipment employed would include excavators, tractors, graders, cranes, forklifts, loaders, backhoes, welders, paving equipment, cement and mortar mixers, and air compressors. Each piece of equipment was assumed to operate between six to eight hours a day during the applicable phase of construction. For purposes of the analysis, construction of the Project is expected to commence in January 2025 and would end in March 2026.

Operational Emissions

Operation of the Project results in emissions from area sources (e.g., landscaping, maintenance equipment, and consumer products), mobile sources (e.g., automobiles and trucks), energy sources (e.g. electricity and natural gas), water and wastewater conveyance, and fugitive refrigerants from air conditioning and refrigerators.

Energy source emissions would include emissions produced through generation of electricity and the use of natural gas. The Project would be subject to compliance with the energy conservation measures mandated by Title 24 of the California Building Standards and California's 2022 Building Energy Efficiency standard. CalEEMod assumed compliance with the 2019 Title 24 standards by default, which is conservative as the 2022 Title 24 standards are currently applicable.

Mobile source emissions were primarily derived from vehicle trips generated by the Project, including residence and employee trips to and from the site and occasional truck trips for delivery or pick-up. Trip generation rates used in the analysis were derived from the *5150 Pacific Coast Highway Development, City of Long Beach Trip Generation Analysis and Vehicle Miles Traveled Screening* (Transportation Analysis), included as **Appendix H**. Based on the Project's Transportation Analysis, the Project would result in a net total of 507 additional daily trips.

For purposes of calculating stationary source emissions, CalEEMod defaults were used to estimate emissions from the use of consumer products, architectural coatings, and landscape equipment.

Supply, conveyance, treatment, and distribution of water to the Project would require the use of electricity, which would result in associated indirect GHG emissions. CalEEMod default values were used to estimate the amount of water required for the site and the GHG emissions associated with the supply, conveyance, treatment, and distribution of water for the Project.

Refrigerants are substances used in equipment for air conditioning (A/C) and refrigeration. Most of the refrigerants used today are hydrofluorocarbons or blends thereof, which can have high GWP values. All equipment that uses refrigerants has a charge size (i.e., quantity of refrigerant the equipment contains), and an operational refrigerant leak rate, and each refrigerant has a GWP that is specific to that refrigerant. The Project includes A/C units and heat pumps. CalEEMod default values were applied based on the assumed land uses, which quantify refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime, and then derives average annual emissions from the lifetime estimate.

Thresholds of Significance

An impact is considered significant if the Project would:

- **GHG -1:** Generate GHG emissions either directly or indirectly, that may have a significant impact on the environment.
- **GHG-2:** Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

The evaluation of an impact under CEQA requires measuring data from a project against both existing conditions and a "threshold of significance." For establishing significance thresholds, the Office of Planning and Research's amendments to the CEQA Guidelines Section 15064.7(c) state "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by

experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

CEQA Guidelines Section 15064.4(a) further states, ". . . A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use . . .; or (2) Rely on a qualitative analysis or performance-based standards."

CEQA Guidelines Section 15064.4 provides that a lead agency should consider the following factors, among others, in assessing the significance of impacts from greenhouse gas emissions:

- **Consideration #1:** The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
- **Consideration #2:** Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- **Consideration #3:** The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

As noted in Section 4.6.1, *Regulatory Setting*, the City has adopted a qualified CAP that is included in the City's General Plan Land Use Element and fulfills the requirements of the overarching State regulations on GHG reduction (AB 32 and SB 32). The 2022 Scoping Plan promotes compliance with a local GHG reduction strategy (e.g., CAP) consistent with CEQA Guidelines section 15183.5. Accordingly, if the Project is consistent with the CAP, the Project would also be consistent with the 2022 Scoping Plan. The CAP allows the City to review plans and projects for consistency with GHG reduction strategies and targets included in the CAP in lieu of a project-specific GHG CEQA analysis.[3] Therefore, because the CAP is consistent with State and local reduction targets, the evaluation of the Project for consistency with the CAP is used by the City in this EIR as the sole basis for determining the significance of the Project's GHG-related impacts on the environment.

Project Impacts

Threshold GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact GHG-1: Less Than Significant Impact

Short Term Construction Greenhouse Gas Emissions

[3] City of Long Beach. *Long Beach Climate Action Plan*, Adopted in August 2022. https://www.longbeach.gov/globalassets/lbcd/media-library/documents/planning/lb-cap/adopted-lb-cap_-aug-2022. Accessed August 2024.

Project construction would result in direct emissions of CO_2, N_2O, and CH_4 from construction equipment, the transport of materials, and construction workers to and from the Project Site. Construction-related emissions are expected from the following construction activities: interior demolition, building construction, and architectural coating. For purposes of analysis, construction of Project is expected to commence in January 2025 and would end in March 2026. The construction schedule utilized in the analysis, shown in **Table 4.6-2: Construction Duration**, represents a "worst-case" analysis scenario should construction occur any time after the respective dates.

Table 4.6-2: Construction Duration

Construction Activity	Start Date	End Date	Days
Interior Demolition	01/01/2025	05/01/2025	87
Building Construction	05/02/2025	03/31/2026	238
Architectural Coating	08/01/2025	03/03/2026	153

Consistent with industry standards and typical construction practices, each piece of equipment listed in **Table 4.6-3: Construction Equipment Assumptions** would operate up to a total of eight (8) hours per day with the exception of air compressors, or more than two-thirds of the period during which construction activities are allowed pursuant to the City Code.

Table 4.6-3: Construction Equipment Assumptions

Construction Activity	Equipment	Quantity	Hours Per Day
Interior Demolition	Excavators	1	8
	Graders	1	8
	Tractors/Loaders/Backhoes	2	8
Exterior Building Construction	Cement and Mortar Mixers	1	8
	Paving Equipment	1	8
	Tractors/Loaders/Backhoes	1	8
	Cranes	1	8
	Forklifts	1	8
	Welders	2	8
Architectural Coating	Air Compressors	2	6
*Source: CalEEMod version 2022.1.1. Refer to **Appendix B** for model data outputs.*			

Construction GHG emissions are typically summed and amortized over the lifetime of the Project (assumed to be 30 years), then added to the operational emissions.[4] Total GHG emissions

[4] The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13,* August 26, 2009).

generated during all phases of construction were combined and are presented in **Table 4.6-4: Construction Greenhouse Gas Emissions**.

Table 4.6-4: Construction Greenhouse Gas Emissions

Construction	$MTCO_2e$ per Year
2025	431
2026	116
Total Construction GHG Emission	547
30-Year Amortized Construction	18
*Source: CalEEMod version 2022.1.1. Refer to **Appendix B** for model data outputs.*	

As shown in **Table 4.6-4,** the Project total construction would result in 547 $MTCO_2e$ (approximately 18 $MTCO_2e$ per year when amortized over 30 years). Once construction is complete, the generation of these GHG emissions would cease.

Long Term Operation Greenhouse Gas Emissions

Operational or long-term emissions occur over the life of the Project. GHG emissions would result from direct emissions such as Project generated vehicular traffic, on-site combustion of natural gas, operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power over the life of the Project, the energy required to convey water to, and wastewater from the Project Site, the emissions at landfills associated with disposal of solid waste generated by the Project, and any fugitive refrigerants from air conditioning or refrigerators. **Table 4.6-5: Project GHG Emissions Summary** summarizes the operational-source GHG emissions from the Project. For detailed GHG emissions by operational emission source (mobile source, area source, energy source, etc.), please refer to the **Appendix B** to this Draft EIR.

Table 4.6-5: Project GHG Emissions Summary

Emission Source	$MTCO_2e$ per Year
Construction Amortized over 30 Years	18
Area Source	5
Energy	252
Mobile	528
Water	14
Refrigerants	0
Total Project Emissions	817
Service Population (593 students + 50 employees)	643
Annual Project Emissions	1.3 per service population
Project Threshold	**1.4 $MTCO_2e$ per service population**
Threshold Exceeded?	No
Notes: 1. Totals may not add up exactly due to rounding in the modeling calculations.	

*Source: CalEEMod version 2022.1.1. Refer to **Appendix B** for model data outputs.*

As the Project's GHG emissions would be below the City's 1.4 metric tons of CO_2 equivalent per year per service population ($MTCO_2e$ per year per service population) threshold, it would not interfere with the State's goals for reducing GHG emissions. Approximately 95 percent of the Project's emissions are from energy and mobile sources which would be further reduced by implementation of current state programs. It should be noted that the Project and the City have no control over vehicle emissions (approximately 58 percent of the Project's total emissions). However, these emissions would decline in the future due to statewide measures including the reduction in the carbon content of fuels, CARB's advanced clean car program, CARB's mobile source strategy, fuel efficiency standards, cleaner technology, and fleet turnover. Additionally, the Southern California Association of Government's (SCAG's) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal) is also expected to help California reach its GHG reduction goals, with reductions in per capita transportation emissions of 19 percent by 2035.[5] Accordingly, the Project does not interfere with the State's efforts to reduce GHG emissions in 2030. Project operations would benefit from the implementation of current and potential future energy regulations including the SB 100 renewable electricity portfolio target of 60 percent renewable energy by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

As shown in **Table 4.6-5**, the Project would generate approximately 817 $MTCO_2e$ annually from both construction and operations and would not exceed the SCAQMD's proposed GHG threshold of 3,000 $MTCO_2e$ per year.[6] Approximately 95 percent of the Project's emissions are from energy and mobile sources which would be further reduced by implementation of Statewide programs and measures, including the reduction in the carbon content of fuels, CARB's advanced clean car program, CARB's mobile source strategy, fuel efficiency standards, cleaner technology, and fleet turnover. Additionally, SCAG's 2020-2045 RTP/SCS is also expected to help California reach its GHG reduction goals, with reductions in per capita transportation emissions of 19 percent by 2035.[7] Accordingly, the Project would not interfere with the State's efforts to reduce GHG emissions in 2030.

Project operations would benefit from the implementation of current and potential future energy regulations including the SB 100 renewable electricity portfolio target of 60 percent renewable energy by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. It should be noted that the Project would comply with the 2022 Title 24 Part 6 Building Energy Efficiency Standards (2022 Energy Code). Among other updates, the 2022 Energy Code includes updated standards including new electric heat pump requirements for offices and banks; and the expansion of solar PV and battery storage standards to additional land uses including offices. Projects whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code. Title 24 is part of the State's

[5] Southern California Association of Governments, *SB 375 Regional Plan Climate Targets*, https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets. Accessed August 2024.
[6] On September 28, 2010, air quality experts serving on the South Coast AQMD GHG CEQA Significance Threshold Stakeholder Working Group recommended an interim screening level numeric bright-line threshold of 3,000 $MTCO_2e$ annually. The Working Group was formed to assist the South Coast AQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, various city and county planning departments. The numeric bright line and efficiency-based thresholds, which were developed for consistency with CEQA requirements for developing significance thresholds, are supported by substantial evidence and provide guidance to CEQA practitioners and lead agencies for determining whether GHG emissions from a project are significant.
[7] Southern California Association of Governments. *SB 375 Regional Plan Climate Targets.* <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets> Accessed August 2024.

plans and regulations for reducing emissions of GHGs to meet and exceed AB 32 and SB 32 energy reduction goals. Therefore, the Project would have a less than significant impact on GHG emissions.

Threshold GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-2: Less Than Significant Impact

The Project's GHG emission impacts are evaluated by assessing the Project's consistency with applicable GHG reduction strategies and local actions approved or adopted by CARB, SCAG, and the City. As there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions.

To evaluate consistency with the CAP, the Project is required to demonstrate conformance by:

- Demonstrating consistency with the City's General Plan
- Determining if the Project screens out of the CAP Action consistency
- Demonstrating consistency with the CAP GHG Emission Reduction Action
- Identifying alternative Project emission reduction measures and additional GHG reductions
- Demonstrating consistency with the CAP Adaption Actions

The Project would also be subject to compliance with all building codes in effect at the time of construction, which would include energy conservation measures mandated by Title 24 of the California Building Standards Code – Energy Efficiency Standards. Because Title 24 standards require energy conservation features in new construction (e.g., high- efficiency lighting, high-efficiency heating, ventilating, and air-conditioning (HVAC) systems, thermal insulation, double-glazed windows, water conserving plumbing fixtures), they indirectly regulate and reduce GHG emissions. California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The most recent 2019 standards went into effect January 1, 2020. The 2022 Energy Code and associated Title 24 standards will go into effect January 1, 2023.

City of Long Beach Climate Action and Adaptation Plan

The City of Long Beach Climate Action and Adaptation Plan (CAAP) was adopted on August 16, 2022, and is a comprehensive planning document outlining the City's proposed approach both to address climate impacts on Long Beach and to reduce Long Beach's impact on the climate by reducing GHG emissions. The Project's consistency with the CAAP is shown on **Table 4.6-6: Climate Action and Adaptation Plan Consistency** below**.**

Table 4.6-6: Climate Action and Adaptation Plan Consistency

CAAP Actions		Consistency	
BE-1	Provide Access to Renewable Generated Electricity	Consistent	The Project would be consistent with State building code requirements as Title 24 advances to implement the State's decarbonization goals.
BE- 2	Increase Use of Solar Power	Consistent	The Project would be consistent with State building code requirements as Title 24 advances to implement the State's decarbonization goals.
BE- 7	Evaluate Building Codes to Incentivize Electric New Residential and Commercial Buildings	Consistent	The Project would be consistent with energy conservation measures mandated by Title 24 by creating development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions through such features such as solar photovoltaic power, electric vehicle charging stations, energy-efficient appliances, water-efficient plumbing fixtures and fittings, and water-efficient landscaping.
T-2	Expand and Improve Pedestrian Infrastructure Citywide	Consistent	The Project would not generate a substantial number of daily or peak-hour vehicle trips to warrant modifications to any transportation facilities. Based on the trip generation analysis, the Project would generate 1,695 daily trips as compared to 1,188 existing trips.
T-3	Increase Bikeway Infrastructure Citywide	Consistent	The Project would promote pedestrian and bicycle safety and access to the Project Site by engaging with the existing dedicated bike throughfare along the Pacific Coast Highway with bicycle parking and lockers on the existing subterranean parking level 1.
T-8	Increase Density and Mixing of Land Uses	Consistent	The Project would improve access to high quality housing for special needs residents and expand student housing opportunities in proximity to open space, public transportation, and a wide range of services and goods. In addition, the Project would promote sustainable development through the adaptive reuse of an existing seven-story office building into a 593-bed private dormitory (housing for students) development that includes supportive uses and amenities that promote interaction and communication between students such as large lounge areas and active outdoor recreational areas.

CAAP Actions		Consistency	
T-9	Integrate SB 743 Planning with the CAAP Process	Consistent	The Project would generate an additional 507 trips compared to the existing office land use.
W-1	Ensure Compliance with State Law Requirements for Multifamily and Commercial Property Recycling Programs	Consistent	The Project would be required to comply with State law requirements for recycling and waste management.
Source: City of Long Beach, City of Long Beach Climate Action and Adaptation Plan, 2022. Refer to **Appendix B** for detailed checklist.			

City of Long Beach Climate Action Plan

The City of Long Beach adopted its Climate Action Plan (LB CAP) in August 2022 to use as a guide towards meeting long term GHG emissions reduction goals and creating a community that is more resilient to the effects of climate change. The LB CAP outlines a range of actions the City will take to reduce GHG emissions and adapt to the effects of climate change. These actions are organized by themes, economic sectors, and types of climate stressors, including Extreme Heat, Air Quality, Drought, Sea Level Rise + Flooding, Building + Energy, Transportation, and Waste Management.

To address project-level consistency with the LB CAP under CEQA, the City has prepared a five-step Climate Action + Adaptation Plan Consistency Review Checklist (CAAP Checklist) to streamline the environmental review process. The CAAP Checklist procedure requires that projects demonstrate consistency with the City's General Plan (Step 1), determine if projects screen out of the CAAP Action consistency (Step 2), demonstrate consistency with the CAAP GHG Emission Reduction Actions (Step 3), identify alternative project emission reduction measures and additional GHG reductions (Step 4), and demonstrate consistency with the CAAP Adaptation Actions (Step 5). All projects must complete Steps 1, 2, 3, and 5.

Step 1 of the CAAP Checklist consistency evaluation is related to whether the Project is consistent with the City's General Plan Land Use Element and the underlying assumptions related to population growth. The Project consists of a 120,000 SF (square foot) office building to be reused for a private dormitory (housing for students). Implementation of the Project would require a change in land use designation or zoning and would not be consistent with the existing land use designations on the Project Site. The Project would be inconsistent with the Land Use Element (2019) of the City's General Plan. Based on this conclusion, the analysis proceeds to determine whether the Project will achieve emissions of 1.4 $MTCO_2e$ per service population or lower. In this case, the Project would result in approximately 1.3 $MTCO_2e$ per year per service population (see **Table 4.6-5**). Therefore, the Project related GHG emissions would be considered consistent with the CAAP Actions and the analysis is complete (no Project-specific GHG analysis would be required).

2022 Electric Code

The 2022 Energy Code was adopted on August 11, 2021 and approved for inclusion into the California Building Standards Code in December 2021. The 2022 Energy Code is focused on energy use in buildings and are encourages use of efficient electric heat pumps, establishment of electric-ready requirements for new homes, expansion of solar photovoltaic and battery storage

standards, and strengthened ventilation standards. A requirement of the 2022 Energy Code is that new buildings with permit applications applied for on or after January 1, 2023, must comply with the requirements of the 2022 Energy Code. As the Project will begin construction after January 2023, it will be obligated to comply with the requirements of the 2022 Energy Code. Accordingly, the Project would not conflict with the requirements of the 2022 Electric Code and any impact would be less than significant.

CALGreen

CALGreen is the State of California's mandatory green building standards code. CALGreen requires new commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. The Project would be obligated to incorporate all applicable mandatory measures required by CALGreen. Accordingly, the Project would not conflict with the requirements of the CALGreen and any impact would be less than significant.

California Air Resource Board Scoping Plan Consistency

The 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279, the California Climate Crisis Act. Currently, the transportation, electricity, and industrial sectors are the largest GHG contributors in the State. The 2022 Scoping Plan plans to achieve the targets established by AB 1279 primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks and decarbonizing the electricity and industrial sectors.

As discussed above, approximately 95 percent of the Project's GHG emissions are from energy and mobile sources which would be further reduced by the 2022 Scoping Plan measures directed towards zero-emission transportation. It should be noted that the City has no control over vehicle emissions (approximately 95 percent of the Project's total emissions). However, these emissions would decline in the future due to statewide measures encouraging reductions in GHGs, as well as the introduction of cleaner technology and fleet turnover. Further, the Project would not obstruct or interfere with efforts to increase zero emission vehicles (ZEVs) or State efforts to improve system efficiency. Compliance with applicable State standards would ensure consistency with State and regional GHG reduction planning efforts, including the 2022 Scoping Plan. Therefore, the Project would result in a less-than-significant impact related to conflict with the 2022 Scoping Plan.

Regional Transportation Plan/Sustainable Communities Strategy Consistency

On September 3, 2020, SCAG's Regional Council adopted Connect SoCal (2020 RTP/SCS). The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The 2020 RTP/SCS embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. SCAG's RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15, described above (Section 3, *Regulatory Setting)*.

The 2020 RTP/SCS contains over 4,000 transportation projects, ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs and replacement

bridges. These future investments were included in county plans developed by the six county transportation commissions and seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices for everyone. The RTP/SCS is an important planning document for the region, allowing project sponsors to qualify for federal funding.

On April 4, 2024, SCAG's Regional Council adopted Connect SoCal (2024 Regional Transportation Plan/Sustainable Communities Strategy [2024 RTP/SCS]). Through full implementation, the 2024 RTP/SCS would reduce traffic congestion, improve air quality, and improve the region's long-term economic vitality. In addition, new strategies for addressing the housing crisis, adapting to climate change and investing in underserved communities are included in the 2024 RTP/SCS. Similar to the 2020 RTP/SCS, this strategy was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses, and local stakeholders regarding the development, integrated management and operation of transportation systems and facilities that would function as an intermodal transportation network. The 2024 RTP/SCS is a long-term plan that invests in a healthy, prosperous, accessible, and connected future for the six counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura.

The 2024 RTP/SCS contains more than 2,000 local projects, including those identified and submitted by six county transportation commissions across the region. These potential projects are funded by a combination of federal, state, and local dollars; thus, allowing them to advance under federal and state regulations.

The plans account for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness. Both the 2020 and 2024 RTP/SCS are supported by a combination of transportation and land use strategies that help the region achieve State GHG emissions reduction goals and FCAA requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry, and utilize resources more efficiently. GHG emissions resulting from development-related mobile sources are the most potent source of emissions, and therefore Project comparison to the RTP/SCS is an appropriate indicator of whether the Project would inhibit the post-2020 GHG reduction goals promulgated by the State. The Project's consistency with the RTP/SCS goals is analyzed in detail in **Table 4.6-7: 2024 and 2020 Regional Transportation Plan/Sustainable Communities Strategy Consistency**.

Table 4.6-7: 2024 and 2020 Regional Transportation Plan/Sustainable Communities Strategy Consistency.

SCAG Goals	Compliance	
2024 Regional Transportation and Plans/Sustainable Communities Strategy Consistency		
Mobility: Build and maintain an integrated multimodal transportation network.		
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions	N/A.	This is not a project specific policy and i therefore not applicable.
Ensure that reliable, accessible, affordable, and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.	N/A.	This is not a project specific policy and i therefore not applicable.
Support planning for people of all ages, abilities, and backgrounds	N/A.	This is not a project specific policy and i therefore not applicable.
Communities: Develop, connect, and sustain communities that are livable and thriving.		
Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances	Consistent.	The Project is located in an urban area in proximity to existing community services. Additionally, the Project is located near existing transit routes.
Produce and preserve diverse housing types in an effort to improve affordability, accessibility, and opportunities for all households	Consistent:	The Project would involve the adaptive reuse of an existing office to support a private dormitory (housing for students) . The Project would include a variety of unit styles including one- to six person suites. The Project would help to provide new housing opportunities in the City.
Environment: Create a healthy region for the people of today and tomorrow.		
Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change.	Consistent	As discussed in the Project's Air Quality Assessment, the Project would not exceed SCAQMD's regional or localized thresholds. Based on the Friant Ranch decision, projects that do not exceed the SCAQMD's localized significance thresholds (LSTs) would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and result in no criteria pollutant health impacts. Therefore, the Project would not result in health impacts and would implement all feasible mitigation to reduce GHG emissions.

Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and waters.	Consistent.	While the Project is not a transportation improvement Project, location of the Project within a developed area would reduce trip lengths, which would reduce GHG and air quality emissions.
Conserve the region's resources.	Consistent.	The Project would involve the adaptive reuse of an office building. Therefore, Project development would not result in a loss of the region's resources.
Economy: Support a sustainable, efficient, and productive regional economic environment that provides opportunities for all people in the regions.		
Improve access to jobs and educational resources.	Consistent:	The Project proposes a private dormitory (housing for students) development within an urban area, in close proximity to other residential and commercial uses. Therefore, the location of the Project would improve access to job opportunities.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.	N/A	As the Project is not a commercial project, this is not applicable. However, the Project includes new private dormitory (housing for students) that would support access to jobs and educational resources.
2020 Regional Transportation and Plans/Sustainable Communities Strategy Consistency		
GOAL 5: Reduce greenhouse gas emissions and improve air quality.	Consistent	The Project would be required to comply with California Building Energy Efficiency Standards and CALGreen, thus would not dramatically impact air quality. The Project's emissions would not exceed the SCAQMD 's 3,000 MTCO2e per year threshold and would result in a less than significant GHG impact.
GOAL 6: Support healthy and equitable communities.	Consistent	As discussed in the Air Quality Assessment, the Project would not exceed regional or localized thresholds for criteria pollutants. Based on the Friant Ranch decision, projects that do not exceed the SCAQMD 's LSTs would not violate any air quality standards, contribute substantially to an existing or projected air quality violation, nor result in no criteria pollutant health impacts.

Source:
1. Southern California Association of Governments, *Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy, 2024.*
2. Southern California Association of Governments, Connect SoCal (2020 – 2045 Regional Transportation Plan/Sustainable

Communities Strategy, 2020

The goals stated in the RTP/SCS were used to determine consistency with the planning efforts previously stated. As shown in **Table 4.6-7**, the Project would be consistent with the stated goals of the RTP/SCS. However, the Project would not conflict with implementation of the stated goals of the RTP/SCS. Therefore, the Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's post-2020 mobile source GHG reduction targets.

The Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for reducing the emissions of GHGs because the Project would generate low levels of GHGs, and would not impede implementation any applicable GHG reduction plan. Therefore, the impacts would be less than significant.

Cumulative Impacts

Section 3.3, Cumulative Development, identifies no related projects within an approximately 1-mile radius of the Project Site that are planned, under construction, or have been recently completed. GHGs are global pollutants, unlike criteria air pollutants and TACs, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about 1 day), GHGs have much longer atmospheric lifetimes of 1 year to several thousand years that allow them to be dispersed around the globe.

It is generally the case that an individual project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-related GHG emissions would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. In addition, the Project as well as other cumulative related projects would also be subject to all applicable regulatory requirements, which would further reduce GHG emissions. As discussed above, the Project would not conflict with the CAAP Checklist, the RTP/SCS, the CARB Scoping Plan, or any other GHG reduction plan. Therefore, the Project's cumulative contribution of GHG emissions would be less than significant and the Project's cumulative GHG impacts would also be less than cumulatively considerable.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation:

Not applicable. Project-specific and cumulative impacts related to greenhouse gas emissions would be less than significant.

4.7 Hazards and Hazardous Materials

This section of the EIR describes the potential hazards (other than geologic, flood, and wildfire hazards) associated with construction and operation of the Project. This evaluation of hazards and hazardous materials is based on the Phase I Environmental Site Assessment (ESA), prepared by Citadel EHS on February 28, 2024, contained in **Appendix E, Phase I Environmental Site Assessment**.

4.7.1 Regulatory Setting

Federal

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA)(42 U.S.C. § 9601 *et seq*.), commonly known as the "Superfund," provides federal funding to identify and remediate hazardous materials sites. CERCLA establishes requirements concerning closed and abandoned hazardous materials sites; provides for liability of persons responsible for releases of hazardous materials at these sites; and establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also enabled revision of the National Contingency Plan (NCP). The NCP (40 CFR Part 300) established the National Priorities List, identifying hazardous materials cleanup sites around the country and provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous materials.

The Superfund process includes conducting a preliminary site assessment/inspection, listing on the National Priorities List (NPL), preparation of a remedial investigation/feasibility study (RI/FS), a record of decision identifying the cleanup method, remedial design, and remedial action. The NPL is a list of the worst hazardous waste sites that have been identified by Superfund.

The Superfund Amendments and Reauthorization Act (SARA) reauthorized and amended CERCLA to provide clarification on the law, new means of enforcement, and increased State and citizen involvement in the Superfund program. SARA increased the Superfund trust fund to $8.5 billion.

Toxic Substances Control Act

The Toxic Substances Control Act of 1976 (TSCA) (15 U.S.C. ch. 53, subch. I §§ 2601–2629) Charged the U.S. Environmental Protection Agency (EPA) with the authority to regulate testing, record keeping, and reporting requirements for certain chemical substances. Specific substances, including polychlorinated biphenyls (PCBs), asbestos, lead-based paint (LBP), and radon were specifically addressed by the TSCA.

Resource Conservation and Recovery Act/Hazardous and Solid Waste Act

Resource Conservation and Recovery Act (RCRA) (42 U.S.C. ch. 82 § 6901 *et seq*.) authorized the U.S. EPA with enacting a "cradle to grave" system of regulating hazardous wastes. This includes enabling, reporting, and record keeping requirements for the generation, transportation, treatment, storage, and disposal of hazardous wastes.

Emergency Planning and Community Right-to-Know Act

The federal Emergency Planning and Community Right-To-Know Act (EPCRA) was enacted to inform communities and residents of chemical hazards in their area. Businesses are required to report the locations and quantities of chemicals stored on-site to both State and local agencies. EPCRA requires the U.S. EPA to maintain and publish a digital database list of toxic chemical releases and other waste management activities reported by certain industry groups and federal facilities. This database, known as the Toxic Release Inventory, gives the community more power to hold companies accountable for their chemical management.

Hazardous Materials Transportation Act

The Hazardous Materials Transportation Act of 1975 (HMTA) (49 U.S.C. §§ 5101–5127) authorizes the U.S. Department of Transportation (DOT) to regulate the transportation of hazardous materials in the United States. The DOT is the primary regulatory authority for the interstate transport of hazardous materials and establishes regulations for safe handling procedures (i.e., packaging, marking, labeling, and routing).

Clean Water Act

The Clean Water Act (CWA) (33 U.S.C. Section 1251 *et seq*.) was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and certain non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). In California, NPDES permitting authority is delegated to, and administered by, the nine Regional Water Quality Control Boards (RWQCBs). The Project is within the jurisdiction of the Los Angeles RWQCB.

Section 402 of the Clean Water Act authorizes the California State Water Resources Control Board (SWRCB) to issue NPDES General Construction Storm Water Permit (Water Quality Order 99-08-DWQ), referred to as the “General Construction Permit.”

Construction activities can comply with and be covered under the General Construction Permit provided that they:

- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving off-site into receiving waters;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation; and
- Perform inspections of all best management practice (BMPs).

NPDES regulations are administered by the RWQCB. Projects that disturb one or more acres are required to obtain NPDES coverage under the Construction General Permits.

Occupational Safety and Health Act

Congress passed the Occupational and Safety Health Act of 1970 (OSH Act)(29 U.S.C. §651 *et seq*.) to ensure worker and workplace safety. The OSH Act was intended to ensure that employers provide places of employment free from recognized hazards to safety and health. The OSH Act

established the National Institute for Occupational Safety and Health (NIOSH) as the research institution for the Occupational Safety and Health Administration (OSHA), a division of the U.S. Department of Labor that oversees the administration of the OSH Act. OSHA's Hazardous Waste Operations and Emergency Response Standard applies to five groups of employers and their employees. This includes any employees who are exposed or potentially exposed to hazardous substances (including hazardous waste) and who are engaged in clean-up operations; corrective actions; voluntary clean-up operations; operations involving hazardous wastes at treatment, storage, and disposal facilities; and emergency response operations.

State

California Fire Code

The California Fire Code (CFC) is included in the California Building Standards Code (Cal. Code of Regs., Tit. 24, Part 9). The CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution.

Hazardous Materials Release Response Plans and Inventory Act of 1985

The Hazardous Materials Release Response Plans and Inventory Act (Business Plan Act) (Health and Safety Code, Div. 20, Ch. 6.95), requires businesses using hazardous materials to prepare a plan that describes their facilities, hazardous materials inventories, emergency response plans, and training programs. Businesses must submit this information to their respective County Department of Environmental Health (DEH). The DEH verifies the information and provides it to agencies responsible for protection of public health and safety and the environment. Business Plans are required to include emergency response plans and procedures in the event of a reportable release or threatened release of a hazardous material. These plans must include, but are not limited to:

- Protocols for immediate notification to the administering agency and to the appropriate local emergency rescue personnel.
- Procedures for the mitigation of a release or threatened release to minimize any potential harm or damage to persons, property, or the environment.
- Evacuation plans and procedures, including immediate notice, for the business site.

Business Plans are also required to include training for all new employees, and annual training, including refresher courses, for all employees in safety procedures in the event of a release or threatened release of a hazardous material.

Hazardous Waste Control Act

The Hazardous Waste Control Act of 1972 (Health and Saf. Code, § 25100 *et seq*.) created the State hazardous waste management program, which is similar to, but more stringent than, the federal RCRA program. The act is implemented by regulations contained in Title 26 of the California Code of Regulations, which describes the following required aspects for the proper management of hazardous waste: identification and classification; generation and transportation; design and permitting of recycling, treatment, storage, and disposal facilities; treatment standards; operation of facilities and staff training; and closure of facilities and liability requirements. These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act and

Title 26, the generator of hazardous waste must complete a manifest that accompanies the waste from generator to transporter to the ultimate disposal location. Copies of the manifest must be filed with the Department of Toxic Substances Control (DTSC).

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) required the administrative consolidation of six hazardous materials and waste programs (Program Elements) under one agency, a Certified Unified Program Agency (CUPA). The CUPA designated for the City of Long Beach is the Long Beach Fire Department and Long Beach Environmental Health Department.

The Unified Program is intended to provide relief to businesses complying with the overlapping and sometimes conflicting requirements of formerly independently managed programs. The Unified Program is implemented at the local government level by CUPAs. Most CUPAs have been established as a function of a local environmental health or fire department. Some CUPAs have contractual agreements with another local agency, a participating agency, which implements one or more Program Elements in coordination with the CUPA.

The Program Elements consolidated under the Unified Program are Hazardous Waste Generator and On-site Hazardous Waste Treatment Programs ("Tiered Permitting"); Aboveground Petroleum Storage Tank Spill Prevention, Control, and Countermeasure (SPCC) plans; Hazardous Materials Release Response Plans and Inventory Program (Hazardous Materials Disclosure or "Community-Right-To-Know"); California Accidental Release Prevention Program (Cal ARP); Underground Storage Tank (UST) Program; and Uniform Fire Code Plans and Inventory Requirements.

Department of Toxic Substances Control (DTSC)

The DTSC is a department of the California Environmental Protection Agency (CalEPA) with responsibility for implementing and enforcing California's own hazardous waste laws (known collectively as the Hazardous Waste Control Law). Although similar to RCRA, the California Hazardous Waste Control Law and its associated regulations define hazardous waste more broadly and regulate a larger number of chemicals. Hazardous wastes regulated by California but not by the U.S. EPA are called "non-RCRA hazardous wastes." Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

The Hazardous Waste and Sites List (Cortese List) (Gov. Code Sec. 65962.5) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services lists of contaminated drinking water wells, sites listed by the SWRCB as having underground storage tank leaks and have had a discharge of hazardous wastes or materials into the water or groundwater and lists from local regulatory agencies of sites that have had a known migration of hazardous waste/material.

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. Employers are required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 Cal. Code Regs. §§ 337-340). The regulations specify requirements for employee training, availability

of safety equipment, accident-prevention programs, and hazardous substance exposure warnings. In addition, Cal/OSHA regulates medical and/or infectious waste.

CalOSHA has established construction-related asbestos standards (Cal. Code Regs., Art. 4, Sec. 1529). These standards regulate handling and disposal of asbestos encountered during construction activity. Construction related asbestos standards apply to exposure associated with construction work such as demolition and excavation.

CalOSHA has also established standards addressing lead paint encountered during construction (Cal. Code Regs., Art. 4, Sec. 1532.1). These standards include exposure assessment, safety requirements, and employee training pertaining to lead exposure and handling.

Regional

South Coast Air Quality Management District

Los Angeles County lies within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The agency's primary responsibility is ensuring that State and federal ambient air quality standards are attained and maintained in the South Coast Air Basin (SCAB). The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

The following is a list of SCAQMD rules that are required of construction activities associated with the Project:

Rule 403 (Fugitive Dust) – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce Particulate Matter of 10 microns or less (PM10) emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM10 suppression techniques are summarized below.

Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.

a) All on-site roads are paved as soon as feasible, watered regularly, or chemically stabilized.

b) All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.

c) The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.

d) Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down following the workday to remove soil from pavement.

Rule 1166 – This rule sets requirements to control the emission of volatile organic compounds (VOC) from excavating, grading, handling, and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

Rule 1466 – This rule requires minimization of off-site fugitive dust emissions from earth-moving activities at sites containing specific toxic air contaminants by establishing dust control measures.

Included among the provisions of Rule 1466 are requirements for ambient PM10 monitoring, dust control measures, and notification, signage, and recordkeeping requirements. Rule 1466 does not apply to earth-moving activities of soil with applicable toxic air contaminant(s) of less than 50 cubic yards.

Rule 1403 – This rule specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos containing materials (ACM).

Local

City of Long Beach General Plan

The Public Safety Element (1975, reprint 2004) includes goals to address the City's safety goals, fire protection, geologic hazards, crime prevention, man-made disasters, and risk management. The Public Safety Element is a planning document that primarily addresses hazards that could affect large segments of the population and does not include specific regulatory requirements. The following goals are applicable to the Project:

Development Goals

Goal 2: Utilize safety considerations, as a means of encouraging and enhancing desired land use patterns.

Goal 3: Provide an urban environment, which is as safe from all types of hazards as possible.

Goal 5: Use physical planning as a means of achieving greater degrees of protection from safety hazards.

Goal 7: Assure continued safe accessibility to all urban land uses throughout the City.

Goal 10: Strive to encourage urbanization patterns, which preserve and/or create greater safety for residents and visitors.

Protection Goals

Goal 1: Use safety precautions as one means of preventing blight and deterioration.

Goal 3: Reduce public exposure to safety hazards.

City of Long Beach Municipal Code

The Long Beach Municipal Code includes the following applicable regulations regarding hazards and hazardous materials:

- **Chapter 8.85: Underground and Aboveground Storage Tanks.** The purpose of this chapter is to designate the Long Beach CUPA as the Unified Program Agency for purposes of enforcing and assuming responsibility for the regulation of the underground storage of hazardous substances within Long Beach, and as the local agency enforcing the Aboveground Petroleum Storage Act requirements under State law.

- **Chapter 8.86: Hazardous Materials Release Response Plans and Inventory.** The purpose of this chapter is to designate the Long Beach/Signal Hill CUPA as the administering agency for Long Beach for the enforcement and regulation of Chapter 6.95 of Division 20 of the California Health and Safety Code and Article 80 of the Uniform Fire Code and all applicable regulations thereunder.

- **Chapter 8.87: Hazardous Waste Control.** The purpose of this chapter is to designate the Long Beach CUPA as the administering agency for the enforcement and regulation of Chapter 6.5 of Division 20 of the California Health and Safety Code, and the applicable requirements thereunder, within the jurisdiction of the City.

- **Chapter 8.88: Hazardous Materials – Cleanup.** The purpose of this chapter is to require compliance with the hazardous waste control laws and to require proper cleanup methods and procedures for spills of hazardous material.

- **Chapter 8.96: Stormwater and Runoff Pollution Control.** The purpose of this chapter is to protect and improve water quality of receiving waters in a manner that is consistent with the federal Clean Water Act.

- **Chapter 18.48: Fire Code.** The City adopted the 2022 California Fire Code, as Long Beach Municipal Code Chapter 18.48.010 – Adoption of California Fire Code.

- **Chapter 18.79. Methane Gas Mitigation.** This chapter sets forth the minimum requirements of the City for control of methane gas intrusion emanating from geologic formations. The requirements do not regulate flammable vapor that may originate in and propagate from other sources, which include, but are not limited to, ruptured hazardous material transmission lines, underground atmospheric tanks, or similar installations.

City of Long Beach Natural Hazard Mitigation Plan

The City's Natural Hazard Mitigation Plan, adopted in March 2023, is a planning document that addresses the policies, programs, projects, and other activities to reduce risks from disasters to the people, property, economy, and environment within the City. The plan includes risk assessments and mitigation strategies for several disasters, including earthquakes, severe weather, tsunamis, climate change, flooding, dam failure, drought, and other hazards of interest.

4.7.2 Environmental Setting

The following sections describe the environmental setting based on the Phase I ESA conducted for the Project Site and is included as **Appendix E**.

Existing Conditions

The Project Site is in an urbanized area of the City, which includes office, commercial, residential, religious, and institutional uses. The Project Site is bounded by Pacific Coast Highway to the north; commercial, religious, office, senior services, and institutional uses to the east; East Anaheim Street to the south; and Clark Avenue to the west. Pacific Coast Highway is lined by commercial uses and residential development farther north; East Anaheim Street is lined by Recreational Park Golf Course 18, and Clark Avenue is lined by a mix of commercial and residential uses.

The nearest airport to the Project Site is Long Beach Municipal Airport, located approximately 1.60 miles north of the Project Site. Review of the Long Beach Airport's Influence Area Map indicates the Project Site is outside of the Airport Influence Area (AIA) boundaries.[1] Additionally, there are no other airports or airstrips within 2.0 miles of the Project Site.

[1] County of Los Angeles, Long Beach Airport: Airport Influence Area, 2003, https://case.planning.lacounty.gov/assets/upl/project/aluc_airport-long-beach.pdf. Accessed June 6, 2024.

Historical and Present Uses on the Project Site

The Project Site is currently developed with an approximately 120,000 sf office building with three subterranean parking levels, surface parking lot, and associated landscaping. Stationary equipment at the Project Site includes three cable-traction elevations, a 15,000-gallon underground water storage tank, hot water heaters, compressors, a cooling tower, dry-type transformers, a fire pump, and a sump. Carbon monoxide monitors are located throughout the subterranean parking levels.

The Project Site reconnaissance consisted as part of the Phase I ESA included an inspection of the Project Site and a perimeter survey of the surrounding properties in compliance with American Society for Testing and Materials (ASTM) standards. The survey identified potential sources of environmental concern including a cooling water treatment container, electrical equipment containing PCBs, self-luminescent tritium exit signs, the sump, and the underground water storage tank. However, these items were found to appear in working order with no signs of staining or leaking or hazardous substances, and none of these items are expected to represent a significant environmental condition.

Historic tenants at the Project Site include a gasoline station from at least 1931 to 1952; a restaurant from 1953 to 1969; and a gasoline station with a car wash from 1972 to 1979. Various professional tenants have occupied the Project Site since 1981. The existing office building is occupied by various professional office tenants.

As noted in the Phase I ESA, historic occupancy of the Project Site as a gasoline station from 1931 to 1952 and a gasoline station with a car wash from 1972 to 1979 may represent an environmental concern. However, given that the Project Site has been redeveloped with an existing office building with three subterranean parking levels, the historic occupancies of gasoline stations at the Project Site are not likely to represent a significant environmental concern.

Asbestos-containing Materials

A building material is considered to be ACM if at least one sample collected from the homogenous material shows asbestos present in an amount greater than one percent (>1%). Materials with less than one percent (<1%) asbestos are not regulated by the U.S. EPA or OSHA. However, the California Division of Occupational Safety and Health (DOSH) does regulate materials with greater than one-tenth of one percent (>0.1%) under California Code of Regulations (CCR) Title 8, §1529. These materials are considered asbestos-containing construction materials (ACCM). Prior to the 1980s, a variety of building construction materials commonly used asbestos for insulation and as a fire retardant.

The existing office building on the Project Site was constructed in 1981, prior to the ban using asbestos-containing building materials in electrical equipment which came into effect in 1989. No testing is known to have been performed to evaluate for ACMs at the Project Site. Because of the age of the existing building on the Project Site, it is assumed there is a presence of ACM.

Lead-Based Paint

The California Department of Public Health (CDPH) and United States Department of Housing and Urban Development define LBP as paints containing greater than 1.0 milligram per square centimeter (mg/cm^2), as well as paints containing greater than or equal to 0.5 percent lead by weight or 5,000 milligrams per kilogram (mg/kg) or parts per million (ppm) total lead. Paint containing less than these amounts but greater than the limit of detection is generally termed

"lead-containing paint" (LCP). LBP and LCP generally do not pose a health risk unless the material is disturbed or sufficiently deteriorated to produce dust, which may be airborne and inhaled or ingested. Structures constructed prior to 1978 may contain LBP. In 1978, the federal government banned the consumer use of LCP.

The existing office building at the Project Site was constructed in 1981, prior to the 1978 ban on LBP/LCP; however, all commercial structures regardless of the date of construction likely contain lead-based or lead-containing glazing, varnishes, stains, coatings, paints, and primers. No testing is known to have been performed to evaluate for the presence of LBP at the Project Site. Because of the age of the existing building, it is assumed there is a presence of LBP.

Polychlorinated Biphenyls

PCBs were an ingredient added to a variety of building materials during manufacture, most notably, but not limited to, caulking, putty, and glazing, particularly around windows, door frames, and building joints. Building materials containing PCBs were used in many buildings in the 1950s through the 1970s, and potentially before the 1950s. There are significant regulations regarding the removal of these materials during demolition and/or renovation, both from an environmental protection standpoint as well as an occupational health and safety standpoint. In addition, under the TSCA, building materials that contain PCBs at or above 50 ppm are considered an "unauthorized use" of PCBs, and removal can be compelled under TSCA. The presence of PCBs may have the potential to impact a property's future land use.

The existing office building was constructed in 1981, prior to the ban using PCBs which came into effect in 1978. However, due to the close range in construction dates in relation to the PCB ban, building materials containing PCBs may have been used in the construction of the existing building. No testing is known to have been performed to evaluate for the presence of PCBs at the Project Site. Because of the age of the existing building, it is assumed there is a presence of PCBs.

Radon

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium (Ra) atoms. The U.S. EPA has prepared a map to assist National, state, and local organizations to target their resources and to implement radon-resistant building codes. Review of the U.S. EPA Map of Radon Zones places the Project Site in Zone 2. Zone 2 has an average indoor radon concentration between 2.0 and 4.0 picocuries per liter (pCi/L). In a survey conducted for the Phase I ESA, 15 tests were performed within the 90804 zip code for the presence of radon. Of these, one test was found to contain radon in excess of 4.0 pCi/L. Site-specific radon values were not available and were not a part of the Phase I ESA. Based upon the radon zone classification, radon is not considered to be a significant environmental concern for the Project Site.

Methane

The Project Site is located within the City of Long Beach Methane Gas Mitigation Zone. For sites within the Methane Gas Mitigation Zone, the Long Beach Department of Development Services, through Chapter 18.79 of the Long Beach Municipal Code, requires that subsurface soil vapor sampling for methane be conducted prior to any new development. Therefore, a methane survey would be required if the Project Site is to be re-developed. The Project involves the adaptive reuse of the existing office building on-site and does not include any new development within the

Project Site. As such, Chapter 18.79 of the Long Beach Municipal Code is not applicable to the Project, and the Project would not conduct subsurface soil vapor sampling for methane.

Disaster and Evacuation Routes

Disaster routes are transportation routes, such as freeway, highway, or arterial routes, which are pre-identified for use during times of crisis.[2] These routes are used to bring in emergency personnel, equipment, and supplies to impacted areas, to save lives, protect property, and minimize environmental impacts. During a disaster, these routes have priority for clearing, repairing, and restoration over all other roads. The County of Los Angeles states that "Disaster Routes are not Evacuation Routes. Although an emergency may warrant a road be used as both a disaster and evacuation route, they are completely different. An evacuation route is used to move the affected population out of an impacted area." Evacuation routes depend on the nature and location of the emergency or disaster. The County of Los Angeles designates Pacific Coast Highway adjacent to the Project Site a Disaster Route.[3]

Phase I ESA Regulatory Database Search

Preparation of the Phase I ESA included a search of State and federal environmental regulatory databases conducted by Environmental Data Resources (EDR).

The Project Site was identified on numerous environmental databases due to hazardous waste generators in 1999, 2013, 2017, and 2020. No violations were identified on these databases. The Project Site was identified on the Hazardous Waste Manifests (HAZNET) database for generating off-specification, aged, or surplus organics; liquids with pH less than or equal to two; and other organic solids. The Project Site was also identified on the Emergency Response Notification System (ERNS) and California Hazardous Material Incident Report System (CHMIRS) on April 7, 2007, for the release of dirt and dust from the roof that washed down with a non-butyl-based soap into the storm drain due to operator error. The cleanup was completed by Infiniti Environmental. No further cleanup was required. The appearance of the Project Site on these databases reflects proper disposal of hazardous waste. Based on a lack of violations and that the release of dirt, dust, and soap was cleaned up, these listings are not considered to represent a significant environmental concern.

The Project Site was also identified on EDR's Historical Gas Station database in 1931, 1939, and 1948; EDR's Historical Dry Cleaner database in 1976; and the Long Beach UST database with potential historic Project Site addresses. The historical dry cleaner listing referenced a car wash facility, and no USTs were listed on the Long Beach UST database. Based on these listings and review of historic sources, the first gasoline station was on-site prior to 1931; the second gasoline station likely replaced the former gasoline station in 1935 and operated until 1952. The third gasoline station with a car wash facility operated from 1972 to 1979, prior to the development of the existing office building in 1981. Based on the UST listing indicating no tanks and that the Project Site consists of three subterranean parking levels, the historic occupancies of gasoline stations at the Project Site are not likely to represent a significant environmental concern.

Additionally, nearby properties were evaluated for potential on-site vapor encroachment concerns from off-site sources. According to EDR, no historical release of petroleum products from a

[2] Los Angeles County Public Works Department, Disaster Routes, 2023, https://pw.lacounty.gov/dsg/disasterroutes/. Accessed June 6, 2024.
[3] Los Angeles County Public Works Department, Cities of Long Beach and Signal Hill, 2008, https://pw.lacounty.gov/dsg/DisasterRoutes/map/Long%20Beach.pdf. Accessed June 6, 2024.

leaking underground storage tank (LUST) occurred within 0.25-mile and upgradient of the Project Site. Nearby LUST facilities include the following:

- City of Long Beach, located at 5000 East Anaheim Street, is approximately 414 feet west-southwest and cross-gradient of the Project Site. A gasoline leak impacting soil only was reported in December 1989. The case was completed and closed by the Los Angeles Regional Water Quality Control Board on July 22, 1996. This property is not expected to represent a significant environmental concern to the Project Site.
- Former Shell Station, located at 5095 East Pacific Coast Highway, is approximately 320 feet north-northwest and downgradient of the Project Site. A gasoline leak was discovered in 1993. Remedial actions included free product removal in 1993, soil vapor extraction from 1993 to 1995, removal of the USTs and soil excavation in 2002, dual phase extraction in 2015, and potassium sulfate injection from 2019 to 2021. The nearest groundwater monitoring well is located approximately 20 feet west of the Project Site and serves as the off-site upgradient monitoring well. The most recent groundwater monitoring data for this well was in June 2022, and contaminants were not detected above laboratory reporting limits, with the exception of total petroleum hydrocarbon as diesel (TPH), which was detected at 73 micrograms per liter (µg/L). The LUST facility is currently eligible for case closure as of May 12, 2023. Based on regulatory oversight and that the case is currently eligible for closure, this facility is not expected to represent a significant environmental concern to the Project Site.

One property was identified as within 365 feet and cross-gradient of the Project Site on the Historical Gas Station database. This property, located 279 feet west-southwest of the Project Site, is not likely to have adversely affected the Project Site. No properties were identified as within 0.125-mile and upgradient of the Project Site on the Historical Dry Cleaners database.

4.7.3 Impact Analysis

Methodology

Potential direct and indirect impacts were identified in part based on a review of the Phase I ESA, included as **Appendix E**, as well as other documentation, including the City's General Plan and Zoning Ordinance, and the Los Angeles County Airport Land Use Plan.

Thresholds of Significance

The following significance criteria for hazards and hazardous materials were derived from the Environmental Checklist in State CEQA Guidelines Appendix G. An impact of a project would be considered significant if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;
- Impair implementation of or physically interfere within an adopted emergency response plan or emergency evacuation plan;
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildfires.

As discussed in the Initial Study, provided in **Appendix A** of this EIR, and in **Section 6.0, Other CEQA Considerations**, the Project would not emit hazardous emissions or handle hazardous acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and would have a less than significant impact. The Project Site is not included in a list of hazardous materials sites compiled pursuant to Government Code§ 65962.5 and would have no impact; and would not expose people or structures to a significant risk of loss, injury or death involving wildland fires and would have a less than significant impact. As such, no further analysis of this topic in this section is necessary.

Project Impacts

Threshold HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Impact HAZ-1: Less Than Significant Impact.

Construction

Construction activities required for the Project would involve interior and pavement demolition, pool construction, interior renovation and construction, and architectural coating. Based on the age of the on-site buildings (constructed in 1981), ACBMs, LBP, and PCBs may be present. In accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAPS) and SCAQMD regulations, all suspect materials, finishes, and coating that would be impacted by renovation or demolition regardless of the date of construction would be surveyed for the presence of ACBMs by State-licensed asbestos consultants, as well as for LBP and PCBs. The removal of any ACBMs, LBP, or PCBs would be conducted in compliance with Cal/OSHA standards. Cal/OSHA standards regulate handling and disposal of asbestos encountered during construction work such as demolition and excavation. SCAQMD Rule 1403 establishes requirements to prevent asbestos emissions during building demolition, including requirements for asbestos surveying, notification, ACBM removal procedures and time schedules, ACBM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). Rule 1403 requires records maintenance, including waste shipment records, and are required to use appropriate warning labels, signs, and markings. Similarly, LBP standards include exposure assessment, safety requirements, and employee training pertaining to lead exposure and handling. Building materials with a PCB concentration of 50 ppm or greater would be properly disposed according to TSCA standards.

Additionally, during the demolition and construction phase, construction equipment and materials may include fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction. It is reasonably anticipated that materials would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions. Compliance with applicable federal, State, and local requirements concerning the handling, storage, and disposal of hazardous waste would reduce the potential to release contaminants.

Project construction would include grading and export of minor amounts of construction debris. Construction activity would comply with SCAQMD Rule 403, addressing fugitive dust sources, Rule 1166 addressing VOC emissions from excavating, grading, handling, and treating VOC-contaminated soil, and Rule 1466, requiring minimization of off-site fugitive dust emissions from earth-moving activities at sites containing specific toxic air contaminants. Compliance with the regulatory requirements associated with Project construction and the requirements of the NPDES Construction General Permit would reduce impacts to less than significant during Project construction activities.

Operation

The Project would adaptively reuse the existing office building into a private dormitory (housing for students). Project operations would likely involve uses employing common maintenance and janitorial supplies, such as cleaners and solvents, paints and thinners for Project Site maintenance, herbicides and pesticides for landscaping, and other common chemicals. The limited quantities and nature of chemicals use by the Project would not be considered significant. The use of these materials would be in accordance with the manufacturers' specifications for use, storage, and disposal of such products which have been formulated to avoid substantial exposure hazards. Compliance with applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential to release contaminants. Therefore, impacts related to the routine transport, use, and disposal of hazardous materials during Project operations would be less than significant.

Threshold HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Impact HAZ-2: Less Than Significant Impact.

Construction

As previously discussed, the Project Site was identified on numerous environmental databases due to hazardous waste generators in 1999, 2013, 2017, and 2020. However, no violations were identified on these databases. Additionally, given the construction date of the existing building (1981), existing building materials could potentially contain ACM, LBP, and PCBs. As described above, the Project would be required to survey the existing building on-site for the presence of ACM, LBP, and PCBs and remove any ACBMs, LBP, or PCBs in compliance with Cal/OSHA and SCAQMD standards. Compliance with the regulatory requirements associated with Project construction would reduce impacts to less than significant.

As discussed in the Initial Study of this EIR, the Project Site is not located on a hazardous sites list compiled pursuant to California Government Code Section 65962.5. As mentioned above, historical uses of the Project Site include a gas station, restaurant, and car wash uses. The DTSC

Cortese List lists only lists one site in the City, located approximately 23 miles southwest of the Project Site in the San Pedro Basin, which lies between the coasts of the City and Catalina Island. Furthermore, according to the Phase I ESA, given that the Project Site has been redeveloped with an existing office building with three subterranean parking levels, the historic occupancies of gasoline stations at the Project Site are not likely to represent a significant environmental concern. Therefore, construction of the Project would not create a significant hazard to the public or the environment, and Project impacts during construction activities would be less than significant.

Operation

Project operations would likely involve uses employing common maintenance and janitorial supplies, such as cleaners and solvents, paints and thinners for Project Site maintenance, herbicides and pesticides for landscaping, and other common chemicals. As previously discussed, any routine transport, use, and disposal of these materials during Project operations would adhere to federal, State, and local regulations for transport, handling, storage, and disposal of hazardous substances. Furthermore, hazardous materials/chemicals such as cleaners, paints, solvents, and fertilizers in low quantities do not pose a significant threat related to the release of hazardous materials into the environment. Therefore, Project operations would not create a significant hazard to the public or the environment, and Project impacts during Project operations would be less than significant.

Threshold HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Impact HAZ-5: Less Than Significant Impact.

The nearest airport to the Project Site is the Long Beach Municipal Airport, located approximately 1.60 miles to the north. The Project Site is not located within the Airport Influence Area (AIA). Nevertheless, as explained in Section 4.10, Noise, review of the Project's AIA map indicates that the Project is located outside the AIA boundaries. Additionally, there are no other airports or airstrips within 2.0 miles of the Project Site. As such, although the Project is located within two miles of a public airport, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. A less than significant impact would occur.

Threshold HAZ-6: Impair implementation of or physically interfere within an adopted emergency response plan or emergency evacuation plan?

Impact HAZ-6: Less Than Significant Impact.

The City's Natural Hazard Mitigation Plan was adopted in March 2023, and includes policies and programs to reduce the potential loss of life and property damage as a result of natural disasters.[4] The City is in the process of updating designated evacuation routes in the event of an emergency. The Project would adaptively reuse an existing office building to a residential building for students on previously developed land. Construction activities, including staging, would occur within the boundaries of the Project Site. As such, Project construction would not require the full or partial closure of roads. In addition, the Project would be reviewed by the Long Beach Fire Department (LBFD) to confirm that adequate emergency access for emergency vehicles is provided.

[4] City of Long Beach. Natural Hazard Mitigation Plan, 2023, https://www.longbeach.gov/globalassets/disaster-preparedness/media-library/documents/emergency-preparedness-plans/long-beach-natural-hazard-mitigation-plan-2023. Accessed June 6, 2024.

Therefore, the Project would not interfere within an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Cumulative Impacts

Section 3.3, Cumulative Development*,* identifies no related projects within an approximately 1-mile radius of the Project Site that are planned, under construction, or have been recently completed.

The Project Site consists of developed land featuring an existing office building with three subterranean parking levels, surface parking lot, and associated landscaping. As explained above, the removal of any ACBMs, LBP, and PCBs present on-site would be conducted in compliance with Cal/OSHA and SCAQMD standards. Compliance with other applicable federal, State, and local requirements concerning the handling, storage, and disposal of hazardous waste during Project construction and operations would reduce the Project's potential to release contaminants. Therefore, the Project would not contribute to cumulative impacts regarding hazardous materials.

The Project Site is not located on a hazardous site list compiled pursuant to California Government Code Section 65962.5. Additionally, as explained above, any transport or handling of hazardous waste materials during Project construction and operation would be required to comply with all federal and State requirements to minimize and reduce the exposure of the public to adverse hazardous impacts. Based on this information, the Project would not contribute to cumulative impacts of hazardous material.

Additionally, all projects in the City of Long Beach would be required to comply with applicable Cal/OSHA regulations, SCAQMD Rules, and NPDES general permit requirements, and other applicable federal, State, and local regulations regarding the handling, storage, and disposal of hazardous materials. Such requirements would minimize adverse effects anticipated from future projects. Therefore, the Project would not combine with other cumulative development projects to result in Hazards and Hazardous Materials impacts; as a result, cumulative impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Project-specific and cumulative impacts related to hazards and hazardous materials would be less than significant.

4.8 Hydrology and Water Quality

This Section of the EIR identifies and analyzes the hydrologic resources available to the Project while assessing the potential impact the Project could have on those resources. This Section of the EIR is based on the Phase I Environmental Site Assessment (ESA) prepared by Citadel EHS on February 28, 2024, and the Hydrology Study prepared by Kimley-Horn and Associates, Inc. on July 23, 2024, which are included as **Appendix E, Phase I Environmental Site Assessment,** and **Appendix F, Hydrology Study**.

4.8.1 Regulatory Setting

Federal

Clean Water Act

The Clean Water Act, as amended, (CWA)(33 U.S.C. § 1251 *et seq*.) is the primary federal legislation governing water quality. The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Important applicable sections of the CWA include:

- Section 301 prohibits the discharge of any pollutant by any person, except as in compliance with Sections 302, 306, 307, 318, 402, and 404 of the CWA. Sections 303 and 304 provide for water quality standards, criteria, and guidelines.
- Section 401 requires an applicant for any federal permit that proposes an activity which may result in a discharge to "waters of the United States" to obtain certification from the State that the discharge will comply with other provisions of the CWA. The Regional Water Quality Control Board (RWQCB) provides certification.
- Section 402 establishes the National Pollution Discharge Elimination System (NPDES) a permitting system for the discharge of any pollutant (except for dredge or fill material) into waters of the United States. This permit program is administered by the RWQCB and is discussed later in this section.
- Section 404 establishes a permit program for the discharge of dredge or fill material into waters of the United States. This permit program is administered by the United States Army Corps of Engineers (USACE).

Section 402 of the CWA also authorizes the State Water Resources Control Board (SWRCB), a department of the California Environmental Protection Agency (CalEPA), to issue NPDES General Construction Storm Water Permits (Water Quality Order 99-08-DWQ), referred to as the "General Construction Permits."

Construction activities can be covered under and comply with the General Construction Permit provided they:

- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that will prevent all construction pollutants from contacting storm water and with the intent of keeping all products of erosion from moving off-site into receiving waters;
- Eliminate or reduce non-storm water discharges to storm sewer systems and other waters of the nation; and

- Perform inspections of all BMPs.

The SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the construction site discharges directly to a water body listed on the 303(d) list for sediment. Increased compliance tasks under the adopted 2023 Construction General Permit include project risk evaluation, effluent monitoring, receiving water monitoring, electronic data submission of the SWPPP and all other permit registration documents. The SWPPP would also include an Erosion Control Plan that would identify specific measures to control on-site and off-site erosion from the time ground disturbing activities are initiated through completion of grading. The Erosion Control Plan would be included with the Project's Grading Plan and would be subject to approval by the City Engineer.

State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act, as amended (California Water Code, § 13000, *et seq*.) provides the basis for water quality regulation in California. The Act requires a "Report of Waste Discharge" for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair a beneficial use of surface or groundwater of the State. Waste discharge requirements (WDR) resulting from the report are issued by the RWQCB, as discussed below. In practice, these requirements are typically integrated within the NPDES permitting process. The SWRCB conducts its water quality protection authority through the adoption of specific Water Quality Control Plans (Basin Plans). These plans establish water quality standards for particular bodies of water. California water quality standards are composed of three parts: the designation of beneficial uses of water, water quality objectives to protect those uses, and implementation programs designed to achieve and maintain compliance with the water quality objectives.

Central Basin Third Amended Judgment (Central and West Basin Water Replenishment District v. Charles E. Adams)

The Central Basin is an adjudicated basin. The adjudication provides the framework for groundwater management of the Central Basin by apportioning pumping rights to certain parties and strictly limiting extractions to those apportioned rights. The recent Third Amendment to the Central Basin Judgment entered by the Los Angeles Superior Court in 2013 replaced the California Department of Water Resources (DWR) as the Watermaster and created a new Watermaster. The new Watermaster consists of three separate bodies, each with a different function: the Administrative Body to administer the Watermaster accounting and reporting functions, the Water Rights Panel to enforce issues related to pumping rights, and the Storage Panel to approve groundwater storage proposals. The new Watermaster began its duties in July 2014.

Regional

Los Angeles Regional Water Quality Control Board

The Los Angeles Regional Water Quality Control Board (LARWQCB) regulates State water quality standards in the City of Long Beach. Beneficial uses and water quality objectives for surface water and groundwater resources within the Project area are established in the water quality control plans of each RWQCB and mandated by the Porter-Cologne Water Quality Control Act and the CWA.

The RWQCB also implements the CWA Section 303(d) total maximum daily load (TMDL) process, which consists of identifying candidate water bodies where water quality is impaired by the presence of pollutants. The TMDL process is implemented to determine the assimilative capacity of the water body for the pollutants of concern and the establish equitable allocation of the allowable pollutant loading within the watershed. CWA Section 401 requires an applicant pursuing a federal permit to conduct any activity that may result in a discharge of a pollutant to obtain a water quality certification (or waiver) from the applicable RWQCB.

The RWQCB primarily implements basin plan polices through issuing waste discharge requirements for waste discharges to land and water. The RWQCB is also responsible to administering the NPDES permit program, which is designed to manage and monitor point and non-point source pollution. NPDES stormwater permits for general construction activity are required for urban areas with populations greater than 100,000.

Local

County of Los Angeles Hydrology Manual

The City of Long Beach has adopted the Los Angeles County Department of Public Works Hydrology and Hydraulic Design Manual for storm drain planning and design calculations. The Hydrology and Hydraulic Design Manual requires a storm drain conveyance system to be designed for a 25-year storm event, and the combined capacity of the storm drain and street flow shall be able to convey a 50-year storm event. In areas with a sump condition, the conveyance system shall be designed for a 50-year storm event. All drainage improvements in the Project vicinity are subject to review and approval by the City's Department of Public Works.

The City of Long Beach MS4 Permit

On June 30,1999, the LARWQCB issued a municipal storm water NPDES permit to the City of Long Beach. Under the NPDES permit, the City is required to conduct a water quality monitoring program for stormwater and dry weather discharges in the City's municipal separate storm sewer systems (MS4s). While the permit was initially issued for five years, the City directed the LARWQCB to extend the permit until further notice.

City of Long Beach Municipal Code

The City of Long Beach Municipal Code (LBMC) Chapter 8.96, *Stormwater and Runoff Pollution Control*, constitutes "The Stormwater and Runoff Pollution Control Ordinance for the City of Long Beach," pursuant to the Federal Water Pollution Control Act and the Porter-Cologne Water Quality Control Act.[1] As discussed in LBMC Section 8.96.030, the purpose of Chapter 8.96 is to protect and improve water quality of receiving waters by prohibiting illicit discharges and illicit connections to the municipal stormwater systems; eliminate spillage, dumping, and disposal of pollutant materials into the municipal stormwater system; and reduce pollutant loads in stormwater and runoff from land uses and activities identified in the Municipal NPDES Permit.

LBMC Chapter 18.05, *Submittal Documents,* requires that construction documents shall show all mitigation measures required under the NPDES Permit issued by the City and the requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) mandated by the California RWQCB.

LBMC Chapter 18.74, *Low Impact Development Standards*, requires the use of Low Impact Development (LID) standards in the planning and construction of development projects. Chapter

[1] City of Long Beach, Long Beach Municipal Code, https://library.municode.com/ca/long_beach/codes/municipal_code. Accessed August 1, 2024.

18.74 states that LID standards promote the goal of environmental sustainability by helping improve the quality of receiving waters, protecting the Los Angeles and San Gabriel River watersheds, maintaining natural drainage paths, and protecting potable water supplies within the City. A Project's LID Plan must demonstrate compliance with the requirements for infiltration, capture and reuse, evapotranspiration, and/or treatment on the Project Site through the use of BMPs.

4.8.2 Environmental Setting

Surface Water Hydrology

The Project is part of the Nearshore Watershed in the Long Beach Watershed. The Watershed encompasses an area of 16.8 square miles (10,378 acres), 4.8 square miles (3,058 acres) of which are under the Port's jurisdiction. The waterbodies located within the Nearshore Watershed are the Dominguez Channel Estuary, Long Beach Harbor (including the Outer Harbor, Marina, Public Beach Areas, and all other Inner Areas), San Pedro Bay, Colorado Lagoon, Alamitos Bay, Sims Pong, Los Cerritos Wetlands, Los Cerritos Channel Estuary, San Gabriel River Estuary, Long Beach Marina, and the Marine Stadium.

The Project Site is at an elevation of approximately 55 feet above mean sea level (amsl) and appears to slope to the west-northwest. According to the Hydrology Study prepared for the Project, the existing Project Site is approximately 33 percent pervious and is assumed to be broken up into six main drainage areas (DA's).

- **DA 1:** DA 1 is bounded by Pacific Coast Highway to the northeast and the existing building to the southwest. DA 1 is approximately 80 percent pervious; therefore, it is assumed that the stormwater would typically infiltrate into the soils. Any additional runoff water is assumed to sheet flow towards the curb and gutter along Pacific Coast Highway, where it is then conveyed to the nearest grated inlet. DA 1 is assumed to have a higher elevation closer to the building and lower elevation along the property line at Pacific Coast Highway.
- **DA 2:** DA 2 is bounded by Clark Avenue to the west, Pacific Coast Highway to the north, and the existing building to the south. Based on Google Maps review, DA 2 is approximately 15 percent pervious. Due to the existing imperviousness of DA 2, the stormwater within this area is anticipated to sheet flow to the curb and gutter and conveyed to the nearest storm drain inlet.
- **DA 3:** DA 3 is the existing subterranean parking lot ramp, which is bounded Clark Avenue to the west and the existing building to the east. DA 3 is 100 percent impervious and captures the stormwater that is being conveyed down the subterranean parking lot ramp, through a trench drain at the bottom. It is assumed that the stormwater is conveyed to the regional storm drain system that is located along East Anaheim Street.
- **DA 4:** DA 4 is bounded by Clark Avenue to the west and East Anaheim Street to the south. DA 4 is approximately 54 percent pervious and located at the southwest corner of the Project Site. The drainage from this area is assumed to be split between infiltrating to the soil and sheet flowing to the Clark Avenue curb and gutter, where it is captured by the nearest storm drain inlet.
- **DA 5**: DA 5 is bounded East Anaheim Street and spans to the intersection of East Anaheim Street and Pacific Coast Highway. DA 5 is approximately 95 percent pervious; therefore, the stormwater is assumed to infiltrate into the soil. The runoff is assumed to be caused

by the hardscape that connects to the sidewalk, where it is thought to sheet flow to the curb and gutter and captured by the nearest storm drain inlet.

- **DA 6**: DA 6 is the existing building. The building is 100 percent impervious, with roof drains located throughout the roof. Based on the anticipated sheet flow runoff throughout the other DAs, it is assumed that the building has the highest finished surface elevations of all the DAs, forcing the stormwater to either infiltrate through the soils, sheet flow to the curb and gutter towards the nearest storm drain inlet, or be conveyed to the storm drain system located along East Anaheim Street or Pacific Coast Highway.

Flood Hazard

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for the Project area shows the Project Site being covered by one map panel, 06037C1967G.[2] The entirety of the Project Site is classified as Zone X, an area noted as having a minimal flood hazard. The Project is not located near any dams, reservoirs, or large water bodies.

Water Quality

The U.S. Geological Survey defines water quality as "a measure of the suitability of water for a particular use based on selected physical, chemical, and biological characteristics."[3] This can be determined by the quantity of undesired constituents or pollutants in the water and their characteristics. Typical pollutants associated with construction would include sediments from disturbing soils, fuels, lubricants, and liquid waste. From operations typical pollutants would include cleaning solvents, pesticides from landscaping, and petroleum products. While some level of constituents may be acceptable for certain uses (e.g., dust mitigation on a construction site) it may be unsuitable for others (e.g., drinking water). In an urban environment, the quantity of certain pollutants in the stormwater systems is generally associated with the type and intensity of the land use. Highly urban land uses will produce different and varying quantities of pollutants than rural land uses. The Project Site is fully developed with an existing office building and an associated subterranean parking structure with three levels, surface parking lot, and minimal landscaping and likely introduces pollutants typical of office uses into the surrounding environment.

Groundwater Hydrology

The Long Beach Utilities Department (LBUD) provides water services to the Project Site. According to LBUD's 2020 Urban Water Management Plan (UWMP), roughly 60 percent of the City's water is derived from groundwater with the remaining 40 percent imported from the Colorado River and the Sacramento-San Joaquin Bay Delta by the Metropolitan Water District of Southern California (MWD).

The Project Site is within the Central Basin, which is a subbasin of the Coastal Plain of Los Angeles Groundwater Basin and covers approximately 227 square miles in mostly urbanized southern Los Angeles County.

The Central Basin is replenished through natural replenishment from precipitation, recycled water, in-lieu replenishment, imported water from MWD, and imported water injected through the

[2] Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map, 2024, https://msc.fema.gov/portal/search?AddressQuery=5150%20pacific%20coast%20highway%2C%20long%20beach%2C%20california. Accessed June 6, 2024.

[3] U.S. Geological Survey, Water Quality Information by Topic, https://www.usgs.gov/special-topics/water-science-school/science/water-quality-information-topic. Accessed June 11, 2024.

Alamitos Seawater Barrier, which helps protect groundwater in the Central Basin from coastal sweater intrusion.

The total allowable pumping allocation (APA), which is the total annual right to extract water on an ongoing basis, is divided among the owners of these water rights. These annual rights to extract water can be exercised, sold, leased or remain unused.

Because the total APA exceeds the natural yield of the basin, the judgment charges the Water Replenishment District of Southern California (WRD) with the responsibility of replenishing the basin. WRD funds these essential services through a replenishment assessment, meaning that parties extracting water from the Central Basin pay an assessment to WRD on a per acre-foot extracted basis. The replenishment assessment is used by WRD to purchase replenishment water and to fund other programs for the replenishment and protection of the basin.

LBUD pumps groundwater through 27 active wells throughout the service area.

According to the Phase I ESA prepared for the Project by Citadel EHS on February 28, 2024 (**Appendix E**), the nearest groundwater monitoring well, located approximately 20 feet west of the Project Site, has an estimated groundwater depth of approximately 49.4 feet below ground surface (bgs).

4.8.3 Impact Analysis

Methodology

A Hydrology Study was prepared for the Project by Kimley-Horn and Associates, Inc. on July 23, 2024, and is included in **Appendix F**. Existing conditions were assessed and established based on available record documents and data sources from the City of Long Beach and Google Earth. To identify potential impacts to drainage of the Project Site, the Project was compared to existing conditions based on the proposed site plans for this Project and then evaluated for potential impacts per the significance thresholds below.

Regarding other impacts not addressed in the Hydrology Study, to identify potential impacts related to flood hazards, the FEMA Flood Insurance Rate Map (FIRMette) was used to identify the Project Site relative to flood zones and geographical analysis was employed to identify the Project Site relative to bodies of water with flooding potential. Applicable water quality control plans and federal, State, and local regulations and plans were evaluated to determine whether the Project would violate any applicable regulations or standards.

Thresholds of Significance

An impact is considered significant if the Project would:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;
- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

  - Result in substantial erosion or siltation on- or off-site;
  - Substantially increase the rate or amount of surface in a manner which would result in flooding on- or off-site;
  - Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
  - Impede or redirect flood flows;
- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

As discussed in the Initial Study, provided in **Appendix A** of this EIR, and in **Section 6.0, Other CEQA Considerations**, the Project would have no impact related to flood hazard, tsunami, or seiche zones. As such, no further analysis of this topic is necessary.

Project Impacts

Threshold HWQ-1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact HWQ-1: Less Than Significant Impact.

Construction

Construction activities associated with the development of the Project would be typical of those used in comparable adaptive reuse development projects. Although the Project would require minimal excavation and grading, such activities may require the use of water for dust mitigation. Water from dust control and other liquids such as fuels, lubricants, and liquid wastes can create runoff that could temporarily affect water quality. However, such impacts to water quality would be temporary and would last only for the duration of the proposed construction activities.

The Project Site consists of one 51,048-square-foot (1.2 acres) parcel and would involve the adaptive reuse of the existing building on-site. The footprint of the existing building on-site consists of approximately 17,693 square feet. Under the conservative assumption that the entire Project Site, excluding the footprint of the existing building, would be disturbed during construction activities, approximately 33,355 square feet, or 0.77 acres of soil, would be disturbed. As the Project is a tenant improvement project that would involve less than one acre of soil disturbance, the Project would not be required to comply with the NPDES Construction General Permit.

As such, construction of the Project would not significantly impact water quality, and construction impacts would be less than significant.

Operations

As the Project includes the adaptive reuse of the existing building on-site, the Project would involve minimal changes to the existing impervious surfaces on-site and would likely not introduce any new sources of pollutants.

Implementation of the Project could introduce new sources of potential stormwater pollution, such as cleaning solvents, pesticides for landscaping, and petroleum products. Stormwater, including runoff from the proposed building and designated parking areas, could carry pollutants into public storm drains during operations.

According to the Hydrology Study, the Project Site improvements would include on-site storm drain infrastructure, as follows:

- **DA 1**: DA 1 is proposing to install an area of fitness turf, just north of the existing building. It is assumed the turf that is being installed in this DA will be water permeable, which will not increase the storm water runoff within this DA.
- **DA 2**: DA 2 is proposed to have a 63-foot-long by 27-foot-wide (1,700 SF) swimming pool installed, taking the place of the surface parking lot. The swimming pool is anticipated to have pavers installed around the pool, along with a shade structure, and a 728-SF clubhouse. It is assumed the pavers surrounding the wading pool will be permeable for swimming pool drainage. It is not anticipated that the swimming pool will increase storm water runoff.
- **DA 3**: DA 3 will have no drastic improvements that will increase the storm water runoff.
- **DA 4**: DA 4 is proposing to reconstruct two pedestrian paths of travels; however, it is assumed that the hydrology will not drastically increase as the proposed conditions within DA 4 is anticipated to have approximately the same area as the existing conditions.
- **DA 5**: DA 5 would include the installation of new pedestrian path of travels; however, it is also assumed that there will not be drastic changes to the storm water runoff as the DA is still approximately 86 percent pervious.
- **DA 6**: DA 6 will not have any drastic changes that will increase the storm water runoff.

Based on the Hydrology Study's analysis of the Project Site, it is assumed the stormwater runoff under proposed conditions would split between sheet flowing off-site, infiltrating into the soil, or being conveyed to the existing storm drain system located to the north, east and south of the Project Site.

Based on the minimal ground disturbance, the Project would not need to implement LID measures pursuant to Section 18.74, *Low Impact Development Standards,* of the LBMC.

The Project Site has been briefly analyzed for adherence to Low Impact Development (LID) design requirements for stormwater treatment, along with stormwater runoff control for the 50-year (Q50) storm event per the Los Angeles County requirements. The analysis shows that the Project has the potential to decrease the overall runoff flow. Runoff will ultimately discharge to the existing storm drain and catch basin system to the north of the Project Site. Since the total runoff from the Project Site is anticipated to decrease upon Project development, it is assumed that the existing storm drain system has adequate capacity for the proposed development.

Based on the analysis contained in this report, no significant impacts have been identified for surface water hydrology or surface water quality due to the Project's minimal ground disturbance for installation of landscaping and a shallow pool.

Generally, as the Project involves the adaptive reuse of an existing building on an already developed site, any impacts to surface and groundwater quality would be similar to existing conditions. Impacts would be less than significant.

Threshold HWQ-2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impact HWQ-2: Less Than Significant Impact.

Regarding Project construction activities, no water supply wells are located within or in the vicinity of the Project Site. Additionally, as stated in the Environmental Setting above, groundwater in the vicinity of the Project Site is estimated to be at a depth of approximately 49.4 feet bgs, and dewatering is not anticipated for the Project. Furthermore, water used for construction activities, such as cleaning, dust suppression, concrete mixing, would be short-term and minimal. Based on the relatively short-term and minimal construction-related water needs, and the diversified sources of the City's water supplies, construction-related water use would not substantially lower groundwater levels in the Basin.

The Project would adaptively reuse an existing office building to a student residential building and associated on-site improvements, such as parking, on an already fully developed site. The total amount of impervious surface under the Project would conservatively be similar to existing conditions, if not greater due to the proposed removal of a portion of the existing parking area and installation of a pool and new landscaped areas with walkways involving less concrete. During Project operation, in accordance with the Central Basin Judgement, the City's groundwater production is capped at its APA. Any groundwater from the adjudicated Central Basin that is provided by the City to the Project would come from the City's annual cap, which is subject to the management and oversight of the Watermaster. Therefore, operational water demands associated with the Project would not adversely affect groundwater supply. Furthermore, no water supply wells are located within or in the vicinity of the Project Site. The Project would not include the construction of any water supply wells, nor would the Project impact any existing water supply wells. The Project Site is also not within a groundwater recharge area or facility, nor does it represent a source of groundwater recharge. Therefore, the Project would not substantially deplete groundwater supplies nor interfere substantially with groundwater recharge such that the Project would impede the basins' sustainable groundwater management, and impacts would be less than significant.

Threshold HWQ-3a: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site?

Impact HWQ-3a: Less Than Significant Impact.

As discussed in the Hydrology Study, on the majority of the Project Site, stormwater runoff flows outward from the existing building to the curb and gutter towards the nearest storm drain inlet or get conveyed to the public storm drain system located along East Anaheim Street or Pacific Coast highway. Upon completion of construction, the drainage patten of the Project Site would be similar to existing conditions and runoff would continue to discharge to the existing storm drain and catch basin system to the north of the Project Site. The Project would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would result in substantial erosion or siltation on- or off-site. On-site runoff would be directed to on-site inlet structures, including catch basins to convey runoff to a stormwater treatment system. The proposed drainage facilities have been sized to adequately treat runoff water from the Project Site. Impacts would be less than significant.

Threshold HWQ-3b: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Impacts HWQ-3b: Less Than Significant Impact.

Per the FEMA FIRMette for the Project Site, the Project Site is located within Zone X, which denotes an area with a minimal flood hazard. As the Project involves the adaptive reuse of an existing building, upon completion of construction, the amount of impervious surface and drainage patterns of the Project Site would conservatively be similar to existing conditions, if not greater due to the proposed removal of a portion of the existing parking area and installation of a pool and new landscaped areas with walkways involving less concrete. The Project would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would increase surface runoff that would result in flooding. The Project's drainage recommendations would be designed to ensure that all on- and off-site drainage and storm drain facilities would be adequately sized to accommodate runoff from storm events. Furthermore, the proposed drainage design would be reviewed and approved by the City to ensure that the Project does not result in increased flows off-site or otherwise significantly impact downstream drainage facilities. Accordingly, the Project would not cause additional flooding or substantial runoff, exceed the capacity of existing drainage facilities, or impede or redirect flood flows such that on-site or off-site areas are significantly impacted. Impacts would be less than significant.

Threshold HWQ-3c: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Impacts HWQ-3c: Less Than Significant Impact.

As discussed in the Hydrology Study, upon completion of construction, the drainage patten of the Project Site would be similar to existing conditions and runoff would continue to discharge to the existing storm drain and catch basin system to the north of the Project Site. The Project would not alter the course of a stream or river, and would not substantially increase impervious surface in a manner that would result in substantial additional sources of polluted runoff. The Project would include improved on-site storm drain infrastructure. The proposed drainage facilities have been sized to adequately treat runoff water from the Project Site. Accordingly, the proposed development would not cause substantial additional sources of polluted runoff. Impacts would be less than significant.

Threshold HWQ-3d: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Impact HWQ-3d: Less than Significant Impact.

As discussed in the Hydrology Study, upon completion of construction, the drainage pattern of the Project Site would be similar to existing conditions. The Project would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would result in impediments to or redirection of flood flows. The Project Site is located within FEMA Zone X, which denotes an area with minimal flood risk hazard. Even in the event of flood, the Project would not introduce new structures or surfaces that would substantially affect flood waters. Any impact would be less than significant.

Threshold HWQ-5: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact HWQ-5: Less Than Significant Impact.

The Project is within the jurisdiction of the LA RWQCB Basin Plan, which identifies beneficial uses for surface water and groundwater and establishes water quality objectives to attain those beneficial uses, together known as water quality standards. The Project would not degrade water quality in a manner that would interfere with the beneficial uses of local surface water as established by the Basin Plan.

Furthermore, as described in Threshold HWQ-2, the Project Site is within the adjudicated Central Basin, and the Central Basin Judgment serves the same purpose as a groundwater management plan. Since the Project would be served by the City, who is in turn allocated a sustainable allotment of groundwater (i.e., the City's APA), the Project would not conflict with the Judgment.

Additionally, the Project would comply with the City of Long Beach's Stormwater and Runoff Pollution Control Ordinance, as well as the current MS4 permit (NPDES Permit No. CAS004003).

Therefore, the Project would not conflict with or obstruct water quality control plans, and impacts would be less than significant.

Cumulative Impacts

Section 3.3, Cumulative Development, identifies no related projects within an approximately 1-mile radius of the Project Site that are planned, under construction, or have been recently completed. As discussed above, the Project would involve the adaptive reuse of an existing office building to a private dormitory (housing for students), and any impacts to surface water, groundwater and drainage would be similar to existing conditions and would be less than significant. New projects throughout the City of Long Beach could potentially increase the volume of stormwater and contribute to pollutant loading stormwater runoff, resulting in cumulative impacts in hydrology and water quality. However, all projects in the City of Long Beach would be required to mitigate water quality concerns and comply with the City of Long Beach's MS4 permit. Therefore, the Project would not combine with other cumulative development projects to result in water quality impacts; as a result, cumulative impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Project-specific and cumulative impacts related to hydrology and water quality would be less than significant.

4.9 Land Use and Planning

This Section of the EIR discusses impacts associated with the potential land use and planning impacts that may result from the Project. Potential effects are evaluated based on the Project's potential to physically divide an established community and/or 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.

4.9.1 Regulatory Setting

Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a Joint Powers Authority under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization and under State law as a Regional Transportation Planning Agency and a Council of Governments. Generally, SCAG develops long-range regional transportation plans including sustainable communities' strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations, and a portion of the South Coast Air Quality management plans. SCAG also developed the Regional Comprehensive Plan, the Regional Housing Needs Assessment (RHNA), and the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS).

SCAG 2024 Regional Transportation Plan/Sustainable Cities Strategy

On September 30, 2008, Senate Bill (SB) 375 was passed to help achieve Assembly Bill (AB) 32 goals related to the reduction of GHGs through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments, (2) regional allocation of the obligation for cities and counties to zone for housing, and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires MPOs to prepare an SCS within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region.

Every four years, SCAG updates the RTP/SCS. The most recent RTP/SCS outlines a vision for a more resilient and equitable future and contains investment, policies and strategies for achieving the region's shared goals through 2050. The RTP/SCS 2024-2050 includes elements that are organized within the pillars of Mobility, Communities, Environment and Economy. These goals are not mutually exclusive, they are mutually reinforcing. For example, the decisions and actions taken to achieve mobility goals can also help to achieve and support environmental goals. Connect SoCal 2024 was approved by SCAG's Regional Council in April 2024.

The Project's consistency with SCAG's 2024 RTP/SCS is detailed in **Table 4.9-1: Project Consistency with SCAG 2024 RTP/SCS,** in **Section 4.9.3, Impact Analysis**, below.

Local

Long Beach General Plan

The Long Beach General Plan (General Plan) includes goals, policies, and directions to achieve the City's vision of the community and future development. The General Plan includes 11 elements that have been updated at various points between 1966 and 2023. The elements focus on: Air Quality, Conservation, Historic Preservation, Housing, Land Use, Mobility, Noise, Open Space and Recreation, Public Safety, Seismic Safety, and Urban Design. Discussion of the Project's consistency with each of these General Plan elements is provided in **Table 4.9-2: Project Consistency with City of Long Beach General Plan**.

The current Land Use Element, adopted in December 2019 as part of the City's General Plan 2040 Update, uses a different land use planning approach relying upon "PlaceTypes" in lieu of traditional land use designations in that it de-emphasizes specific uses and focuses on the form and character of Long Beach's unique neighborhoods and districts. A number of PlaceType categories, or "districts," tailored to Long Beach define not only the permitted land uses for specific areas in the City, but also preferred development patterns, streetscapes and urban form features that make urban environments visually interesting and functional places for people. PlaceTypes allow more flexibility in land use planning and allow for a mix of compatible uses. The Land Use Element identifies 11 PlaceTypes, as follows:

- Founding and Contemporary Neighborhood
- Multi-Family – Low and Moderate
- Neighborhood-Serving Centers or Corridor – Low and Moderate
- Transit-Oriented Development – Low and Moderate
- Open Space
- Waterfront
- Community Commercial Centers
- Industrial
- Neo-Industrial
- Regional-Serving Facility
- Downtown

The Project Site is designated as a Community Commercial (CC) PlaceType per the City's General Plan Land Use Element. The CC PlaceType permits commercial uses that are automobile oriented.

The Project proposes a General Plan Amendment/Map Change to change the existing CC Placetype of the Project Site to the Neighborhood Serving Center (NSC-Moderate) PlaceType. The NSC-Moderate PlaceType accommodates moderate density mixed use development that is typically located near single-family neighborhoods. The NSC-Moderate PlaceType adheres to the Project's need for residential occupancy. With a General Plan Amendment/Map Change, the Project would be able to take advantage of the adaptive reuse development standards and allow for student residential uses.

Long Beach Zoning Ordinance

The City of Long Beach's Zoning Ordinance is included in Title 21 of the Long Beach Municipal Code (LBMC). It provides development standards (e.g., setbacks, building height, site coverage, parking, and sign requirements), identifies allowable land uses, and specifies other regulations.

Additionally, the Zoning Ordinance provides detailed guidance for development based on, and consistent with, the land use policies established in the General Plan.

The Project Site is in the Community Commercial Automobile-Oriented (CCA) Zoning District, which permits retail and service uses for an entirety community including convenience and comparison shopping for goods and associate services.

The Project also requires a Zoning Code Amendment/Map Change to modify the existing zone from CCA to Mixed-Use (MU-3) to allow the Project's student residential uses and to enable the Project to take advantage of the adaptive reuse development standards. The Project would also require the approval of a Conditional Use Permit (CUP) to allow the "Special Group Residence" for the dormitory use and a Site Plan Review to allow Adaptive Reuse of the building.

4.9.2 Environmental Setting

The Project would adaptively reuse an existing medical office building, building into private dormitory (housing for students).[1] Currently, the facility is underutilized, the Project would provide 149 student residential units. The Project will also include three subterranean levels and ample access to public transportation.

The Project Site has a General Plan land use designation of CC, which permits commercial uses that are automobile oriented. The Project Site is also in the CCA Zoning District, which permits retail and service uses for an entirety community including convenience and comparison shopping for goods and associate services.

Properties along the northeastern boundary of the Project Site have a General Plan land use designation of Neighborhood Serving Center or Corridor Low Density (NSC-L) and a zoning designation of CCA. Properties adjacent to the northern corner of the Project Site has a General Plan land use designation of Multiple Family Residential Low Density (MFR-L) and a zoning designation of CCA. Properties to the west of the Project Site have General Plan land use designations of Founding and Contemporary Neighborhood (FCN) or NSC-L and are zoned Neighborhood Commercial and Residential (CNR); Two-family Residential, standard lot (R-2-N); or Moderate-density Multiple Residential (R-4-R). The property to the south of the Project Site has a General Plan land use designation of Open Space (OS) and a zoning designation of Park (P).

4.9.3 Impact Analysis

Methodology

Potential impacts on land use and planning were evaluated by identifying conflicts between the Project and applicable land use plans. Consistency with land use policies and regulations is determined by reviewing the relevant planning documents applicable to the Project area, including the City of Long Beach's General Plan and Zoning Ordinance and the General Plan land use and

[1] Section 21.15.590 of Long Beach Municipal Code: "Communal housing" means housing for nonfamily groups with common kitchen and dining facilities but without medical, psychiatric or other care. Communal housing includes boarding house, lodging house, dormitory, fraternity house, commune, and religious home. Communal housing does not include handicapped or senior citizen housing, residential care facility, or convalescent hospital or parsonage.

zoning maps. Inconsistency between a project and a land use plan does not on its own represent a significant impact to the environment unless it would result in "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project."[2] California's planning law (Gov. Code § 65000 *et seq*.) does not require a project to demonstrate strict conformity with a land use plan. A project would be considered consistent with a general plan if it demonstrates that it is "compatible with the General Plan's objectives, policies, general land uses and programs."[3] "The question is not whether there is a direct conflict between some mandatory provision of a general plan and some aspect of a project, but whether the project is compatible with, and does not frustrate, the general plan's goals and policies."[4] Accordingly, a project's consistency with a land use plan's goals or achievement of those goals is taken into account when determining potential impacts.

The Project is analyzed for consistency with available planning documents, discussed above in the Regulatory Framework Section, to the extent the plan was adopted for the purpose of avoiding or mitigating an environmental effect. Information for this Section was compiled from the following public planning documents: SCAG 2024 RTP/SCS, Long Beach General Plan, and Long Beach Zoning Ordinance.

Thresholds of Significance

The following thresholds of significance are based on the Environmental Checklist contained in Appendix G of the CEQA Guidelines. A project would result in significant adverse impacts related to land use and planning if the Project would:

- Physically divide an established community; or
- 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.

As discussed in the Initial Study, provided in **Appendix A** of this EIR, and in **Section 6.0, Other CEQA Considerations**, the Project would have no impact related to the physical division of an established community. The Project Site is currently in an urban setting surrounded by existing development and involves the adaptive reuse of an existing seven-story office building to accommodate student housing. Therefore, the Project would not physically divide an established community, and no impact would occur. As such, this Section only addresses potential impacts related to a potential conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Project Impacts

Threshold LUP-2: Would the project 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?

Impact LUP-2: Less than Significant Impact.

[2] CEQA Guidelines Section 15382.
[3] Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001)(91 Cal. App. 4th 342, 378)).
[4] Id.

The Project Site is designated as a CC PlaceType per the City's General Plan Land Use Element. The CC PlaceType permits commercial uses that are automobile oriented. The Project proposes a General Plan Amendment/Map Change to change the existing land use designation of the Project Site from CC to NSC-Moderate. The NSC-Moderate PlaceType accommodates moderate density mixed use development that is typically located near single-family neighborhoods.[5] The NSC-Moderate PlaceType adheres to the Project's need for residential occupancy. Upon City approval of the General Plan Amendment/Map Change, the Project would be consistent with the NSC-Moderate PlaceType as a residential use for students.

The Project Site is zoned as CCA, which permits retail and service uses for an entirety community including convenience and comparison shopping for goods and associate services. The Project also proposes a Zoning Code Amendment/Map Change to modify the existing zone from CCA to MU-3. Special Group Residences are permitted in the MU-3 Zoning District with approval of a CUP; the Project includes an application for the required CUP to allow for dormitory use as a Special Group Residence. The MU-3 Zoning District is intended for the highest intensity neighborhood activity centers in proximity to bus routes and multi-modal corridors. The Project Site, with its proximity to multiple transit facilities and freeways, would be consistent with the purpose of the MU-3 Zoning District, upon approval of the proposed Zoning Code Amendment/Map Change by the City.

The following analysis describes the Project's consistency with current regional and local plans and policies pertaining to land use and planning, which were outlined in further detail in the Regulatory Framework discussion above.

Accordingly, upon approval of the Project's entitlements by the City, the Project would not conflict with the Project Site's General Plan and zoning designations, SCAG 2024 RTP/SCS, General Plan, or Zoning Ordinance. As such, the Project would not 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, and impacts would be less than significant.

SCAG 2024 RTP/SCS

Table 4.9-1 evaluates the Project's consistency with applicable strategies from SCAG's 2024 RTP/SCS. As detailed in **Table 4.9-1**, the Project would be consistent with the applicable goals set forth in the 2024 RTP/SCS. Specifically, the Project would support the goals of the 2024 RTP/SCS to maximize the maximize the productivity of the region's transportation system, support new housing growth as well as protect the environment and health of the region's residents through its location on a developed site in proximity to transit. In addition, the Project would encourage pedestrian circulation at the street level through new landscaping.

[5] City of Long Beach, General Plan Land Use Element, December 2019, pages 65 to 67, https://www.longbeach.gov/globalassets/lbcd/media-library/documents/planning/advance/lueude/land-use-element-final-adopted-december-2019. Accessed August 1, 2024.

Table 4.9-1: Project Consistency with SCAG 2024 RTP/SCS

RTP/SCS Strategies	Project Consistency
Mobility: Build and maintain an integrated multimodal transportation network.	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.	**Consistent.** Although this goal applies at the regional level, the Project would not conflict with its implementation. As discussed in **Section 4.4, Energy**, of this EIR, the Project would be subject to compliance with Title 24 of the California Building Standards Code – Energy Efficiency Standards as well as the appliance energy efficiency standards in Title 20 of the California Code of Regulations.
Support planning for people of all ages, abilities, and backgrounds.	**Consistent.** Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project would include residential housing units for students.
Communities: Develop, connect, and sustain communities that are livable and thriving.	
Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances.	**Consistent.** The Project would be located in an urbanized area of the City, close to transit and in walking distance, to jobs, residences, recreational areas, schools, and commercial areas. The Project Site is within proximity to several transit options. Long Beach Transit (LBT) has multiple stops that travel along the Project Site frontages, including Line 41, 45, and 46 which travels west/east along East Anaheim Street. These LBT routes provide service to the Los Angeles County Metropolitan Transportation Authority (Metro) Downtown Long Beach Station 3.57 miles southwest of the Project. Additional LBT stops for Lines 171 and 175 are provided 250 feet east of the Project Site. Various other LBT Lines, including Lines 91, 111, 112, 121, and 173, are located within 0.5 miles of the Project Site.
Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.	**Consistent.** The Project would include the development of 149 student residential units on an infill site in an urbanized area well-served by transit.
Environment: Create a healthy region for the people of today and tomorrow.	
Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change.	**Consistent.** The Project would promote non-auto travel and reduce single-occupant vehicle trips by being located in a transit-rich area,

Table 4.9-1: Project Consistency with SCAG 2024 RTP/SCS

RTP/SCS Strategies	Project Consistency
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.	providing bicycle parking, and improving the pedestrian environment. Electric vehicle (EV) parking spaces, EV-ready parking spaces, and parking spaces with EV charging stations (EVCS) would be provided pursuant to the California Green Building Standards Code (CALGreen) standards.
Conserve the region's resources.	**Consistent.** The Project is a tenant improvement and adaptive reuse project, surrounded by urban land uses. It is not located on land designated for agricultural uses, natural resources, or conservation.
Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents.	
Improve access to jobs and educational resources.	**Consistent.** The Project Site is located in an existing urbanized area with an established network of roads and freeways that provides local and regional access to the Project Site. The Project Site is also within close proximity to transit and universities that would provide future student residents easy access to educational resources and transit, and services. In addition, the Project Site is located adjacent to commercial, residential, institutional, recreational, religious, office, and senior service uses that would provide future employment opportunities.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.	**Consistent.** Although this goal applies at the regional level, the Project would not conflict with its implementation. As discussed above, the Project would promote clean air and non-auto travel by being located in a transit-rich area, providing EV parking, bicycle parking, and improving the pedestrian environment. The Project will contribute toward, and facilitate, the City's long-term housing needs.

Source: SCAG, Connect SoCal 2024 Program Environmental Impact Report Chapter 2 Project Description, page 2-11, https://scag.ca.gov/sites/main/files/file-attachments/23-3052-peir-2024-draft-2-project-description.pdf?1699406150. Accessed August 21, 2024.

Long Beach General Plan

The City of Long Beach General Plan is the City's comprehensive land use plan that addresses the following subject areas or elements: Air Quality, Conservation, Historic Preservation, Housing, Land Use, Mobility, Noise, Open Space and Recreation, Public Safety, Seismic Safety, and Urban

Design. The Land Use, Housing, and Urban Design elements of the General Plan are generally described below in **Table 4.9-2**, with a consistency analysis of the Project with specific goals and policies of the City's General Plan. Additionally, the Project's consistency with the Mobility Element is analyzed in **Section 4.12, Transportation**, of this EIR.

Table 4.9-2: Project Consistency with City of Long Beach General Plan

General Plan Goals, Strategies, and Policies	Project Consistency Analysis
Land Use Element (2019)	
Goal No. 1: Implement Sustainable Planning and Development Practices	**Consistent:** The Project would promote sustainable design strategies through the adaptive reuse of the existing office building on-site to residential dormitory housing for students. The Project would also include a number of EV parking spaces. Particularly, 10 percent of the total number of parking spaces would be EV charging spaces capable of supporting future Level 2 EV supply equipment (EVSE), 25 percent of the total number of parking spaces would be EV ready, and 5 percent of the total number of parking spaces would be equipped with EVCS.
Strategy No. 1: Support sustainable urban development patterns.	
LU Policy 1-3: Require sustainable design strategies to be integrated into public and private development projects.	
LU Policy 1-4: Require electric vehicle charging stations to be installed in new commercial, industrial, institutional and multiple-family residential development projects. Require that all parking for single-unit and two-unit residential development projects be capable of supporting future electric vehicle supply equipment.	
LU Policy 1-5: Encourage resources and processes that support sustainable development for adaptive reuse projects, as well as appropriate infill projects.	
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.	**Consistent.** The Project's Trip Generation Analysis and Vehicle Miles Traveled Screening Technical Memorandum, contained in **Appendix H** of this EIR, determined whether a Vehicle Miles Traveled (VMT) and/or Levels of Service (LOS) analysis is required for the Project. According to the City of Long Beach Traffic Impact Analysis Guidelines, a traffic impact study is required for any project in Long Beach that is expected to generate 500 or more net new daily trips. The Project is expected to generate less than 50 total net new peak hour trips. Therefore, a traffic impact study is not required for the Project, and the Project is exempt from a VMT and LOS analysis. Additional details are further discussed in **Section 4.12, Transportation**, of this EIR.

Table 4.9-2: Project Consistency with City of Long Beach General Plan

General Plan Goals, Strategies, and Policies	Project Consistency Analysis
Goal No. 2: Strengthen the City's Fiscal Health by Stimulating Continuous Economic Development and Job Growth. **Strategy No. 5:** Expand the Long Beach promise to include not only access to higher education, but to appropriate housing and employment opportunities needed to enjoy the benefits of higher education. **LU Policy 5-5:** Provide excellent transit connections to California State University, Long Beach, City colleges and all major employment and educational campuses.	**Consistent.** The Project Site is located in an existing urbanized area and is in proximity to transit that would provide student residents easy access to jobs and services. As mentioned above, the Project Site is served by multiple transit lines, including LBT Lines 91, 111, 112, 121, and 173, which are located within 0.5 miles of the Project Site that would provide additional public transit services to educational opportunities.
Strategy No. 6: Maintain a full range of City services for the community that is consistent with the revenue available to sustain those services. **LU Policy 6-9:** Encourage the redevelopment of parcels with poor land utilization such as single-use commercial structures on parcels over 5,000 square feet.	**Consistent.** The Project Site is located on one 51,048-square-foot parcel that currently contains a seven-story office building. The Project would adaptively reuse the existing office building into housing for students.
Goal No. 4: Support Neighborhood Preservation and Enhancement **Strategy No. 9:** Protect and enhance established neighborhoods.	**Consistent.** The Project would incorporate a security fence and gate would be provided around the perimeter of the Project Site. Project design would also include lighted entryways, publicly accessible areas, parking areas, and common building and open space residential areas for security purposes.
LU Policy 9-1: Protect neighborhoods from the encroachment of incompatible activities or land uses that may have negative impacts on residential living environments.	**Consistent.** The Project currently has a General Plan land use designation of CC and a zoning designation of CCA. The Project includes an application for a General Plan Amendment/Map Change to change the Project Site's land use designation from the current CC PlaceType to the NSC-Moderate PlaceType. The Project also includes an application for a Zoning Code Amendment/Map Change to change the Project Site's zoning designation from CCA to MU-3, and for a CUP for the Special Group Residence use for the proposed dormitory use. Upon approval of these entitlements, and all other proposed discretionary approvals, by

Table 4.9-2: Project Consistency with City of Long Beach General Plan

General Plan Goals, Strategies, and Policies	Project Consistency Analysis
	the City, the Project's proposed land use would be compatible with the City's General Plan and Zoning Ordinance. As described throughout this EIR, the Project would not have a significant and unavoidable impact on the environment, including the surrounding residential living environments.
LU Policy 9-2: Enhance and improve neighborhoods through maintenance strategies and code enforcement.	**Consistent.** As mentioned above, the Project would be maintained through the installation and implementation of security measures, including a perimeter security fence, lighted entryways, publicly accessible areas, parking areas, and common building and open space residential areas for security purposes.
Goal No. 5: Diversify Housing Opportunities	**Consistent:** The Project would include campus style residential suites for students.
Strategy No. 12: Diversify Long Beach's housing stock.	
LU Policy 12-1: Allow a variety of housing types in new residential developments with the goal of establishing new opportunities for persons of varied income ranges, ages, lifestyles and family needs.	
LU Policy 12-2: Encourage the provision of housing opportunities, services, and amenities for all income levels, age groups, and household types, with opportunities to age in place.	
LU Policy 12-6: Establish clear rules and locations for special housing types, such as congregate care, assisted living, senior housing, student housing, housing for temporary workers and housing with supportive services.	
LU Policy 12-7: Work with students, faculty and alumni from California State University, Long Beach and other higher educational institutions to encourage the development of housing to meet student housing needs and housing needs of recent graduates.	
Goal No. 6: Ensure a Fair and Equitable Land Use Plan	**Consistent.** The Project Site is within close proximity to several transit options.

Table 4.9-2: Project Consistency with City of Long Beach General Plan

General Plan Goals, Strategies, and Policies	Project Consistency Analysis
Strategy No. 14: Promote the equitable distribution of services, amenities and investments throughout the City.	The Project Site would include bicycle parking. The Project would also maintain the existing sidewalks abutting the Project Site along Pacific Coast Highway, East Anaheim Street, and Pacific Coast Highway, and the existing bicycle path abutting the Project Site on Pacific Coast Highway. As such, the Project would continue to encourage walking, bicycling, and the use of public transit.
LU Policy 14-4: Establish livable communities across all neighborhoods that encourage walking, bicycling, using public transit and exercising outdoors, and that provide for economic and social opportunities for all community members.	
Strategy No. 15: Foster community outreach and engagement in planning City projects and programs.	**Consistent.** As described in the Cultural Resources Assessment conducted for the Project, contained in **Appendix C** of this EIR, a Sacred Lands File (SLF) Search was conducted with the Native American Heritage Commission (NAHC). The SLF resulted in positive findings. The NAHC recommended contacting the Gabrieleno/Tongva San Gabriel Band of Mission Indians for more information. Consistent with the requirements of AB 52, the City of Long Beach sent letters to tribes identified by the NAHC and that have expressed an interest in being consulted regarding Native American resources for projects being undertaken in the City. Additional details are further discussed in **Section 4.3, Cultural Resources**, and **Section 4.13, Tribal Cultural Resources**, of this EIR.
LU Policy 15-3: Consult with California Native American tribes early in the planning process to ensure their concerns are appropriately reflected in planning initiatives and projects.	
LU Policy 15-4: Work with the Native American community to identify ways of incorporating, appreciating and highlighting Native American history and culture in public art, museums, events and where applicable, development projects.	
Strategy No. 16: Prevent and reduce disproportionate environmental burdens affecting low-income and minority populations.	**Consistent.** As described throughout this EIR, the Project would not have a significant and unavoidable impact on the environment.
LU Policy 16-8: Require an acoustical analysis prior to project approval for projects subject to CEQA review, for all noise sensitive projects located in an area with noise levels greater than 60 dBA CNEL. All new residential land uses shall be designed to maintain a standard of 45 dBA CNEL or less in building interiors, consistent with the General Plan. Noise reduction measures to achieve this noise level could include, but are not limited to, forced air ventilation so that windows can	**Consistent.** The Project conducted a Noise Analysis, contained in **Appendix G** of this EIR. Additional details are further discussed in **Section 4.10, Noise**, of this EIR.

Table 4.9-2: Project Consistency with City of Long Beach General Plan

General Plan Goals, Strategies, and Policies	Project Consistency Analysis
remain closed and/ or upgraded wall and window assemblies.	
LU Policy 16-13: Locate sensitive land uses (e.g., residences, schools, and daycare centers) to avoid incompatibilities with recommended buffer distances identified in the most current version of the CARB Air Quality and Land Use Handbook: A Community Health Perspective (CARB Handbook). Sensitive land uses that are within the recommended buffer distances listed in the CARB Handbook shall provide enhanced filtration units or submit a Health Risk Assessment (HRA) to the City. If the HRA shows that the project would exceed the applicable thresholds, mitigation measures capable of reducing potential impacts to an acceptable level must be identified and approved by the City.	**Consistent.** As discussed in Threshold AQ-3, the Project would have less than significant impacts regarding the exposure of sensitive receptors to substantial pollutant concentrations. Additional details are further discussed in **Section 4.2, Air Quality,** of this EIR.
Goal No. 8: Increase Access to, Amount of and Distribution of Green and Open Space **Strategy No. 18:** Increase open space in urban areas. **LU Policy 18-1:** Require that new development creatively and effectively integrates private open spaces into project design, both as green spaces and landscaped courtyards.	**Consistent.** The Project would incorporate accessible at-grade open space as well as indoor and outdoor common and private open space for Project residents and guests. The Project would provide approximately 22,523 square feet of open space that would include the aforementioned, student plaza, lawn area, fitness turf, patio, and upper decks. The outdoor open space would include various amenities including benches, lounging areas, pool, pool lounge, picnic tables, shade structures, and landscaping.
Goal No. 9: Preserve, Protect, Restore and Reconnect with Natural Resources **Strategy No. 20:** Preserve, restore and protect water bodies, natural areas and wildlife habitats. **LU Policy 20-5:** Prevent stormwater runoff and pollutants from entering natural water bodies, wildlife habitats, wetlands, rivers and the Pacific Ocean.	**Consistent.** The Project would be required to comply with the City's Stormwater and Runoff Pollution Control Ordinance, as well as the City's municipal separate storm sewer system (MS4) Permit. As the Project is a tenant improvement and adaptive reuse project and requires less than one acre of ground disturbance, the Project would not be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) or implement Low Impact Development (LID) Best Management Practices (BMPs).

Table 4.9-2: Project Consistency with City of Long Beach General Plan

General Plan Goals, Strategies, and Policies	Project Consistency Analysis
	Additional details are further discussed in **Section 4.8, Hydrology and Water Quality**, of this EIR.
Housing Element (2022)	
Goal 1: Provide Increased Opportunities for the Construction of High-Quality Housing	**Consistent.** The Project would adaptively reuse an existing seven-story office building into a private dormitory (housing for students) with 149 total residential units (593 beds) for students.
HE Policy 1.6: Facilitate adaptive reuse of existing structures for residential purposes.	
Goal 4: Address the Unique Housing Needs of Special Needs Residents	
HE Policy 4.5: Encourage California State University at Long Beach and other institutions of higher education to build student, staff, and faculty housing to meet the needs of their students and employees. Partner with educational institutions to expand on-campus and near-campus student housing, in order to relieve the strain on supply for the general city population/housing.	
Urban Design Element (2019)	
Strategy No. 1: Improve function and connectivity within neighborhoods and districts.	**Consistent.** See consistency analysis for UD Policies 1-3 and 1-8 below.
UD Policy 1-3: Promote the adaptive reuse and appropriate infill of resources within the existing urban fabric.	**Consistent.** The Project would involve the adaptive reuse of an existing seven-story office building into a 593-bed private dormitory (housing for students) development.
UD Policy 2-3: Promote enhancement of the built environment through façade improvements, quality and context-sensitive infill development, and landscaping.	**Consistent.** The Project would include new landscaping, which would be provided in outdoor open space throughout the Project Site. Landscaping for the Project would be consistent with LBMC Chapter 21.42, *Landscaping Standards.*
Strategy No. 5: Integrate healthy living and sustainable design practices and opportunities throughout Long Beach	**Consistent.** See consistency analysis with UD Policies 5-3, 5-4, and 5-6 below.
UD Policy 5-3: Provide a range of passive and active areas that promote safe, healthy places for exercise, recreation, family gatherings, and respite within walking distance of all neighborhoods.	**Consistent.** The Project would incorporate open space as well as indoor and outdoor common and private open space for Project residents and guests. The Project would also provide a student plaza, lawn area, fitness turf,

Table 4.9-2: Project Consistency with City of Long Beach General Plan

General Plan Goals, Strategies, and Policies	Project Consistency Analysis
	patio, upper decks, and various other amenities within the aforementioned open spaces.
UD Policy 5-4: Preserve, rehabilitate, and integrate existing buildings into new development projects wherever feasible to encourage adaptive reuse, reduce waste, and maintain local character.	**Consistent.** The Project would adaptively reuse the existing office building on-site to residential housing for college students. In addition to indoor renovations, the Project would also largely maintain the exterior of the existing building and would only include minor visual improvements to the exterior.
UD Policy 5-6: Encourage the establishment of electric vehicle charge points and other alternative fuel accommodations at new public and private projects and suitable locations throughout the City.	**Consistent.** The Project would include EV parking. Particularly, 10 percent of the total number of parking spaces would be EV charging spaces capable of supporting future Level 2 EV supply equipment (EVSE), 25 percent of the total number of parking spaces would be EV ready, and 5 percent of the total number of parking spaces would be equipped with EVCS.
Strategy No. 6: Improve public infrastructure to serve new development, established neighborhoods, commercial centers, and industry and regional-serving facilities within areas of change and future growth areas.	**Consistent.** The Project Electric vehicle (EV) parking spaces, EV-ready parking spaces, and parking spaces with EV charging stations (EVCS) would be provided pursuant to (CALGreen) standards. Additional details are further discussed in **Section 4.4, Energy**, of this EIR.
UD Policy 6-5: Ensure buildings meet the City's requirements for sustainability and green development, both for construction and operation.	
Strategy No. 12: Expand the unified sign program, within the Areas of Change identified in the Land Use Element, to help orient visitors throughout the community. Include freeway identification, gateways, directional signs, and informational signs.	**Consistent.** The Project would include minor visual improvements to the exterior of the existing building on-site, including identification signage for facilities within the Project Site.
UD Policy 12-5: Utilize neighborhood identity and wayfinding signage to establish an identity or theme within an existing neighborhood.	
Strategy No. 14: Building types and forms should contribute to the PlaceType they are sited within and should address potential conflicts between neighboring PlaceTypes by implementing buffering measures and thoughtful design patterns.	**Consistent.** See consistency analysis for UD Policies 14-4 and 14-7 below.

Table 4.9-2: Project Consistency with City of Long Beach General Plan

General Plan Goals, Strategies, and Policies	Project Consistency Analysis
UD Policy 14-4: Protect neighborhoods from the encroachment of incompatible activities or land uses that may have negative impacts on the residential living environment.	**Consistent.** The Project currently has a General Plan land use designation of CC and a zoning designation of CCA. The Project includes an application for a General Plan Amendment/Map Change to change the Project Site's land use designation from the current CC PlaceType to the NSC-Moderate PlaceType. The Project also includes an application for a Zoning Code Amendment/Map Change to change the Project Site's zoning designation from CCA to MU-3, and for a CUP for the Special Group Residence use for the proposed dormitory use. Upon approval of these entitlements, and all other proposed discretionary approvals, by the City, the Project's proposed land use would be compatible with the City's General Plan and Zoning Ordinance. As described throughout this EIR, the Project would not have a significant and unavoidable impact on the environment, including the surrounding residential living environments.
UD Policy 14-7: Utilize building form and development strategies in conjunction with PlaceTypes and the interface between buildings and the streets (Strategy 34-35) to create a comprehensive urban fabric.	**Consistent.** The Project would adaptively reuse the existing office building to residential housing for students. In addition to the interior improvements, the Project would include minor visual improvements to the exterior of the existing building and would largely maintain the exterior. Such exterior improvements would conform to the NSC-Moderate PlaceType. Upon approval of the proposed General Plan Amendment/Map Change to change the existing General Plan land use designation from CC to NSC-Moderate by the City, the proposed improvements to the existing building would be consistent with the NSC-Moderate PlaceType.
Strategy No. 16: "Complete the neighborhood" by filling in gaps (e.g., functional needs like housing, new or missing services, new public amenities or services, healthy food options, flexible uses on larger	**Consistent.** See consistency analysis for UD Policies 16-8 and 16-9 below.

Table 4.9-2: Project Consistency with City of Long Beach General Plan

General Plan Goals, Strategies, and Policies	Project Consistency Analysis
streets and fostering a safe walkable environment within each PlaceType).	
UD Policy 16-9: Ensure properties are maintained and promote the health and visual quality of environments to deter crime.	**Consistent.** Project design would include lighted entryways, publicly accessible areas, parking areas, and common building and open space residential areas for security purposes.
Strategy No. 21: Protect and enhance established Neighborhood-Serving Centers and Corridors – Low and Moderate PlaceTypes.	**Consistent.** The Project would include indoor and outdoor common and private open space, including a student plaza, lawn area, fitness turf, patio, upper decks, and other amenities, for Project residents and guests. As such, the Project would encourage walking and socializing within the Project Site.
UD Policy 21-7: Provide courtyards, paseos, and public plazas that provide open space and encourage walking and socializing at the heart of a neighborhood-serving center or transit stations. Provide adequate open space as density increases**.**	
Strategy No. 37: Frontage shall have well-designed street walls, contributing to making an inviting transition between public and private space. **UD Policy 37-3:** Identify areas for frontage improvements along pedestrian priority areas, described in the Mobility Element on Page 80, Map 13.	**Consistent.** The portion of Pacific Coast Highway that abuts the Project Site is identified as a pedestrian priority area in the City's General Plan Mobility Element. The Project would include buffer landscaping along the entire perimeter of the Project Site, which would improve the Project Site's street frontages, including Pacific Coast Highway.
UD Policy 39-4: Ensure landscaping for new projects complies with Title 23, Chapter 2.7 of the California Code of Regulations, Model for Efficient Landscape Ordinance.	**Consistent.** Pursuant to LBMC Chapter 21.42, *Landscaping Standards*, the Project's proposed landscaping would include drought-tolerant and native plant materials, submit a Landscape Document Package at the time of Project plan check filing for approval by the City, and implement water efficient landscaping standards set forth by the State Model Water Efficient Landscape Ordinance (MWELO).
UD Policy 39-5: Integrate native, drought-tolerant, or low-water-use plant species in streetscapes and design for ease of maintenance to assure their longevity and limit water and resource use.	
Strategy No. 41: Connect neighborhoods, corridors, and centers by maintaining and providing for walkable blocks.	**Consistent.** The Project would include identification signage throughout the Project

Table 4.9-2: Project Consistency with City of Long Beach General Plan

General Plan Goals, Strategies, and Policies	Project Consistency Analysis
UD Policy 41-7: Provide wayfinding signs, pedestrian lighting for safety and security, benches, and public art along alleys, paseos, paths, and trails to enhance neighborhood character and walkability.	Site. The Project would also include the lighting of entryways for safety and security.

Source: City of Long Beach, General Plan, https://www.longbeach.gov/lbcd/planning/advance/general-plan/. Accessed August 22, 2024.

Cumulative Impacts

Section 3.3, Cumulative Development, identifies no related projects within an approximately 1-mile radius of the Project Site that are planned, are under construction, or are recently completed.

The Project would adaptively reuse the existing office building to residential housing for students. The Project includes an application for a General Plan Amendment/Map Change to change the Project Site's land use designation from the current CC PlaceType to the NSC-Moderate PlaceType. The Project also includes an application for a Zoning Code Amendment/Map Change to change the Project Site's zoning designation from CCA to MU-3, and for a CUP for the Special Group Residence use for the proposed dormitory use. Upon approval of these entitlements, and all other proposed discretionary approvals, by the City, the Project's proposed land use would be compatible with the City's General Plan and Zoning Ordinance.

While no cumulative projects are located within a 1-mile radius of the Project Site, any projects within the City would be subject to CEQA and review by City regulatory agencies. This would include a review of each project's consistency with the General Plan, Zoning Ordinance, and other applicable requirements. Any conflicts would be mitigated or resolved through the City's discretionary review and approval process. Impacts to land use would be less than significant. Accordingly, the Project would not have any cumulatively considerable impacts on land use and planning.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Project-specific and cumulative impacts related to land use and planning would be less than significant.

4.10 Noise

This section of the EIR addresses potential noise and vibration impacts associated with the Project. This discussion includes information regarding noise fundamentals, regulatory setting, the existing noise environment, the noise analysis methodology, and the potential Project-related noise and vibration impacts. A noise study was prepared for the Project and is included as **Appendix G, Park Tower Student Housing Building Noise Analysis Memorandum.**

4.10.1 Regulatory Setting

To limit population exposure to physically and/or psychologically damaging as well as intrusive noise levels, the State of California and its counties and cities have established regulations and standards to control unwanted noise. In most areas, automobile and truck traffic is the major source of environmental noise. Traffic activity generally produces an average sound level that remains constant with time. Air and rail traffic, and commercial and industrial activities are also major sources of noise in some areas. Federal, state, and local agencies regulate different aspects of environmental noise. Federal and state agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies.

Federal

Federal Transit Administration

The Federal Transit Administration (FTA) provides guidance for the analysis of noise and vibration in the *Transit Noise and Vibration Impact Assessment Manual* (FTA Guidance Manual). The FTA Guidance Manual provides methodologies for analyzing noise during project construction and operation. Under the Occupational Safety and Health Act of 1970 (29 United States Code [U.S.C.] Section 1919 et seq.), the Occupational Safety and Health Administration (OSHA) has adopted regulations designed to protect workers against the effects of occupational noise exposure. These regulations list permissible noise level exposure as a function of the amount of time during which the worker is exposed. The regulations further specify a hearing conservation program that involves monitoring the noise to which workers are exposed, ensuring that workers are made aware of overexposure to noise, and periodically testing the workers' hearing to detect any degradation.

State

State of California Noise Regulations

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. California Government Code Section 65302(f) requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with California Government Code Section 65302(f) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels. be prepared per guidelines adopted by the Governor's Office of Planning and Research (OPR) identifies suggested land use noise compatibility levels as part of its General Plan Guidelines. These suggested guidelines provide planners with a tool to gauge the compatibility of land uses relative to existing and future noise levels. The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use

types. Noise compatibility by different land use types is categorized into four general levels: "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable." For instance, a noise environment ranging from 50 dBA CNEL to 65 dBA CNEL is considered to be "normally acceptable" for multi-family residential uses, while a noise environment of 75 dBA CNEL or above for multi-family residential uses is considered to be "clearly unacceptable. The land use compatibility guidelines are intended to be an advisory resource when considering changes in land use and policies, such as zoning modifications. In addition, the State through California Environmental Quality Act (CEQA) requires that all known environmental effects of a project be analyzed, including environmental noise impacts.

Local

City of Long Beach General Plan

On June 6, 2023, the City of Long Beach adopted a revised Noise Element (2023 Noise Element) replacing the previous Noise Element from the 1975 General Plan (1975 Noise Element). The 2023 Noise Element identifies several policies and strategies to minimize the impacts of excessive noise levels throughout the community and establishes allowable noise exposure levels from transportation sources for all land uses.

The 2023 Noise Element includes strategies and policies to reduce construction noise impacts. Policies N 12-1 though N 12-7 include measures to reduce construction noise at the source, reduce noise conflicts, limit the allowable hours for construction activities near sensitive uses, establish noise level standards based on PlaceType as part of the City's Municipal Code, and encourage construction best practices that reduce noise.

The following strategies and policies from the long beach noise element are applicable to the Project:

Strategy No. 1: Apply site planning and other design strategies to reduce noise impacts, especially within the Founding and Contemporary Neighborhoods, Multifamily Residential-Low and Moderate, and Neighborhood-Serving Centers and Corridors – Low and Moderate PlaceTypes.

Policy N 1-2: Require noise attenuation measures to be incorporated into all development and redevelopment of sensitive receptor uses, including residential, health care facilities, schools, libraries, senior facilities, and churches in close proximity to existing or known planned rail lines.

Policy N 1-3: Ensure development and redevelopment is considerate of the natural shape and contours of a site in order to reduce noise impacts.

Policy N 1-4: Encourage developers or landowners to incorporate noise reduction features in the site planning process.

Policy N 1- 5: Incorporate urban design strategies such as courtyards, paseos, alleys, plazas and open space areas to provide a buffer to noise sensitive uses.

Policy N 1-6: Ensure that project site design and function minimize the potential adverse impacts of noise.

Policy N 1-7: Encourage educational facilities to locate playgrounds, sports fields, and other outdoor activity areas away from residential areas.

Policy N 1-8: Require new development to provide facilities which support the use of multimodal transportation, including, walking, bicycling, carpooling and transit.

Policy N 1-9: Utilize noise barriers after all practical design-related noise measures have been integrated into the project. In instances, where sound walls are necessary, they should be incorporated into the architectural and site character of the development and pedestrian access should be integrated.

Strategy No. 4: Protect and buffer noise sensitive areas and use through effective building design and material selection.

Policy N 4-1: Encourage developers to utilize noise absorbing building materials.

Strategy No. 5: Implement best practices to reduce impacts of noise from industrial sources.

Policy N 5-6: Site design should consider sensitive receptor locations and place noise sources away from these uses when feasible.

Strategy No. 6: `Minimize vehicular traffic noise in residential areas and near noise-sensitive land uses.

Policy N 6-9: Encourage site planning and building design measures that minimize the effects of traffic noise in residential zones.

Strategy No. 12: Minimize construction noise and vibration levels in residential areas and in other locations near noise-sensitive uses where possible.

Policy N 12-1: Reduce construction, maintenance, and nuisance noise at the source, when possible, to reduce noise conflicts.

Policy N 12-2: Limit the allowable hours construction activities and maintenance operations near sensitive uses.

Policy N 12-3: As part of the City's Municipal Code, establish noise level standards based on PlaceType and time of day, to which construction noise stall conform.

Policy N 12-4: Encourage off-site fabrication to reduce needed onsite construction activities and corresponding noise levels and duration.

Policy N 12-5: Encourage the following construction best practices:

- Schedule high-noise and vibration-producing activities to a shorter window of time during the day outside early morning hours to minimize disruption to sensitive uses.
- Grading and construction contractors should use equipment that generates lower noise and vibration levels, such as rubber-tired equipment rather than metal-tracked equipment.
- Construction haul truck and materials delivery traffic should avoid residential areas whenever feasible.
- The construction contractor should place noise- and vibration-generating construction equipment and locate construction staging areas away from sensitive uses whenever feasible.
- The construction contractor should use on-site electrical sources to power equipment rather than diesel generators where feasible.

- All residential units located within 500 ft of a construction site should be sent a notice regarding the construction schedule. A sign legible at a distance of 50 ft should also be posted at the construction site. All notices and the signs should indicate the dates and durations of construction activities, as well as provide a telephone number for a "noise disturbance coordinator."
- A "noise disturbance coordinator" should be established by the project developer. The disturbance coordinator should be responsible for responding to any local complaints about construction noise. The disturbance coordinator should determine the cause of the noise complaint (e.g., starting too early, bad muffler) and should be required to implement reasonable measures to reduce noise levels.
-

The City, consistent with the California Governor's Office of Planning and Research, has established land use compatibility guidelines for determining acceptable noise levels for specified land uses. **Table 4.10-1: Land Use Compatibility Guidelines for Noise Exposure** shows the land use compatibility guidelines when considering changes in land use and policies, such as zoning modifications.

Table 4.10-1: Land Use Compatibility Guidelines for Community Noise Exposure

Land Use Category	Community Noise Exposure (L_{dn} or CNEL, dBA)			
	Normally Acceptable[1]	Conditionally Acceptable[2]	Normally Unacceptable[3]	Clearly Unacceptable[4]
Residential-Low Density Single-Family, Duplex, Mobile Homes	<60	55 – 70	70 – 75	75<
Residential Multi-Family	<65	60 – 70	70 – 75	75<
Transient Lodging-Motels and Hotels	<65	60 – 70	70 – 80	80<
Schools, Libraries, Churches, Hospitals, Nursing Homes	<70	60 – 70	70 – 80	80<
Auditoriums, Concert Halls, Amphitheaters	-	50 – 70	-	65<
Sports Arenas, Outdoor Spectator Sports	-	50 – 75	-	70<
Playgrounds, Neighborhood Parks	<70	-	68 – 75	73<
Golf Courses, Riding Stables, Water Recreation, Cemeteries	<75	-	70 – 80	80<
Office Buildings, Business Commercial, Professional	<70	68 – 78	-	75<
Industrial, Manufacturing, Utilities, Agriculture	<75	70 – 80	75<	-

CNEL = Community Noise Equivalent Level; L_{dn} = Day/Night Average; NA = Not Applicable

1. Normally Acceptable: Specified Land Use is satisfactory, based on the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
2. Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
3. Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
4. Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: California Office of Planning and Research, General Plan Guidelines (2017), Appendix D.

City of Long Beach Municipal Code

Long Beach Municipal Code (LBMC) Section 8.80, Noise, establishes exterior and interior noise limits for the generation of sound within the City. Maximum noise levels vary based on the receiving land use type and the cumulative duration of noise.

LBMC Section 8.80.150 – Exterior noise limits – Sound levels by receiving land use district. LBMC section 8.80.150(C) establishes if the measured ambient level exceeds the permissible noise limit categories, the allowable noise exposure standard shall be increased in five decibels increments in each category as appropriate to encompass or reflect the ambient noise level.

LBMC Section 8.80.160, Exterior noise limits – Correction for character of sounds. LBMC Section 8.80.160 establishes exterior noise limits for the following receiving land use districts. The Project would be located in District One with the following noise levels as shown below in **Table 4.10-2, Exterior Noise Limits.**

Table 4.10-2: Exterior Noise Limits

Receiving Land Use District	Time Period	Noise Level[1] (dBA)
District One	**Night:** 10:00 p.m.-7:00 a.m.	45
	Day: 7:00 a.m. – 10:00 p.m.	50
District Two	**Night:** 10:00 p.m. – 7:00 a.m.	55
	Day: 7:00 a.m. – 10:00 p.m.	60
District Three	Any time	65
District Four	Any time	70
District Five	Regulated by other agencies and laws	

1. Districts Three and Four limits are intended primarily for use at their boundaries rather than for noise control within those districts.

LBMC Section 8.80.200 – Noise disturbances – Acts specified. LBMC Section 8.80.200 requires that air conditioning equipment generate noise levels of no more than 55 dBA at any point on a neighboring property line. This standard would apply to all air conditioning and refrigerating equipment.

LBMC Section 8.80.202, Construction activity – Noise regulations. LBMC Section 8.80.202 establishes the following noise regulations for construction activities.

A. Weekdays and federal holidays. No person shall operate or permit the operation of any tools or equipment used for construction, alteration, repair, remodeling, drilling, demolition or any other related building activity which produce loud or unusual noise which annoys or disturbs a reasonable person of normal sensitivity between the hours of 7:00 p.m. and 7:00 am. the following day on weekdays, except for emergency work authorized by the Building Official. For purposes of this Section, a federal holiday shall be considered a weekday.
B. Saturdays. No person shall operate or permit the operation of any tools or equipment used for construction, alteration, repair, remodeling, drilling, demolition or any other related building activity which produce loud or unusual noise which annoys or disturbs a reasonable person of normal sensitivity between the hours of seven p.m. on Friday and nine a.m. on Saturday and after six p.m. on Saturday, except for emergency work authorized by the Building Official.

C. Sundays. No person shall operate or permit the operation of any tools or equipment used for construction, alteration, repair, remodeling, drilling, demolition or any other related building activity at any time on Sunday, except for emergency work authorized by the Building Official or except for work authorized by permit issued by the Noise Control Officer.
D. Owner's/employer's responsibility. It is unlawful for the landowner, construction company owner, contractor, subcontractor or employer of persons working, laboring, building, or assisting in construction to permit construction activities in violation of provisions in this Section.
E. Sunday work permits. Any person who wants to do construction work on a Sunday must apply for a work permit from the Noise Control Officer. The Noise Control Officer may issue a Sunday work permit if there is good cause shown; and in issuing such a permit, consideration will be given to the nature of the work and its proximity to residential areas. The permit may allow work on Sundays, only between 9:00 a.m. and 6:00 p.m., and it shall designate the specific dates when it is allowed.

4.10.2 Environmental Setting

Noise Fundamentals

Noise is often defined as unwanted sound. Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A -weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear. Most commonly, environmental sounds are described in terms of an average level that has the same acoustical energy as the summation of all the time-varying events. **Table 4.10-3: Typical Noise Levels** provides typical noise levels.

Table 4.10-3: Typical Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	– 110 –	Rock Band
Jet fly-over at 1,000 feet		
	– 100 –	
Gas lawnmower at 3 feet		
	– 90 –	
Diesel truck at 50 feet at 50 miles per hour		Food blender at 3 feet
	– 80 –	Garbage disposal at 3 feet
Noisy urban area, daytime		
Gas lawnmower, 100 feet	– 70 –	Vacuum cleaner at 10 feet
Commercial area		Normal Speech at 3 feet
Heavy traffic at 300 feet	– 60 –	
		Large business office
Quiet urban daytime	– 50 –	Dishwasher in next room
Quiet urban nighttime	– 40 –	Theater, large conference room (background)
Quiet suburban nighttime		
	– 30 –	Library
Quiet rural nighttime		Bedroom at night, concert hall (background)
	– 20 –	
		Broadcast/recording studio

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	– 10 –	
Lowest threshold of human hearing	– 0 –	Lowest threshold of human hearing

Source: California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013.

Noise Descriptors

The dB scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Several rating scales have been developed to analyze the adverse effect of community noise on people. Because environmental noise fluctuates over time, these scales consider that the effect of noise on people is largely dependent on the total acoustical energy content of the noise, as well as the time of day when the noise occurs. The equivalent noise level (L_{eq}) represents the continuous sound pressure level over the measurement period, while the day-night noise level (L_{dn}) and Community Equivalent Noise Level (CNEL) are measures of energy average during a 24-hour period, with dB weighted sound levels from 7:00 p.m. to 7:00 a.m. Most commonly, environmental sounds are described in terms of L_{eq} that has the same acoustical energy as the summation of all the time-varying events. Each is applicable to this analysis and defined **Table 4.10-4: Definitions of Acoustical Terms.**

Table 4.10-4: Definitions of Acoustical Terms

Term	Definitions
Decibel (dB)	A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20.
Sound Pressure Level	Sound pressure is the sound force per unit area, usually expressed in µPa (or 20 micronewtons per square meter), where 1 pascals is the pressure resulting from a force of 1 newton exerted over an area of 1 square meter. The sound pressure level is expressed in dB as 20 times the logarithm to the base 10 of the ratio between the pressures exerted by the sound to a reference sound pressure (e.g. 20 µPa). Sound pressure level is the quantity that is directly measured by a sound level meter.
Frequency (Hz)	The number of complete pressure fluctuations per second above and below atmospheric pressure. Normal human hearing is between 20 Hz and 20,000 Hz. Infrasonic sound are below 20 Hz and ultrasonic sounds are above 20,000 Hz.
A-Weighted Sound Level (dBA)	The sound pressure level in dB as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.
Equivalent Noise Level (L_{eq})	The average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating

Term	Definitions
	community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
Maximum Noise Level (L_{max}) Minimum Noise Level (L_{min})	The maximum and minimum dBA during the measurement period.
Exceeded Noise Levels (L_1, L_{10}, L_{50}, L_{90})	The dBA values that are exceeded 1%, 10%, 50%, and 90% of the time during the measurement period.
Day-Night Noise Level (L_{dn})	A 24-hour average L_{eq} with a 10 dBA weighting added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity at nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.4 dBA L_{dn}.
Community Noise Equivalent Level (CNEL)	A 24-hour average L_{eq} with a 5 dBA weighting during the hours of 7:00 a.m. to 10:00 a.m. and a 10 dBA weighting added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.7 dBA CNEL.
Ambient Noise Level	The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.
Intrusive	That noise which intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends on its amplitude, duration, frequency, and time of occurrence and tonal or informational content as well as the prevailing ambient noise level.

The scientific instrument used to measure noise is the sound level meter. Sound level meters can accurately measure environmental noise levels to within about plus or minus 1 dBA. Various computer models are used to predict environmental noise levels from sources, such as roadways and airports. The accuracy of the predicted models depends on the distance between the receptor and the noise source.

A-Weighted Decibels

The perceived loudness of sounds is dependent on many factors, including sound pressure level and frequency content. However, within the usual range of environmental noise levels, perception of loudness is relatively predictable and can be approximated by dBA values. There is a strong correlation between dBA and the way the human ear perceives sound. For this reason, the dBA has become the standard tool of environmental noise assessment.

Addition of Decibels

The dB scale is logarithmic, not linear, and therefore sound levels cannot be added or subtracted through ordinary arithmetic. Two sound levels 10 dB apart differ in acoustic energy by a factor of 10. When the standard logarithmic dB is A-weighted, an increase of 10 dBA is generally perceived as a doubling in loudness. For example, a 70-dBA sound is half as loud as an 80-dBA sound and twice as loud as a 60-dBA sound. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dBA higher than one

source under the same conditions. Under the dB scale, three sources of equal loudness together would produce an increase of approximately 5 dBA.

Sound Propagation and Attenuation

Sound spreads (propagates uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6 dB for each doubling of distance from a stationary or point source. Sound from a line source, such as a highway, propagates outward in a cylindrical pattern. Sound levels attenuate at a rate of approximately 3 dB for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics. No excess attenuation is assumed for hard surfaces like a parking lot or a body of water. Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5 dB per doubling of distance is normally assumed. For line sources, an overall attenuation rate of 3 dB per doubling of distance is assumed.

Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The way older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units is generally 30 dBA or more.

Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in dBA, the following relationships should be noted:

- Except in carefully controlled laboratory experiments, a 1-dBA change cannot be perceived by humans.
- Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference.
- A minimum 5-dBA change is required before any noticeable change in community response would be expected. A 5-dBA increase is typically considered substantial.

- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

Effects of Noise on People

Hearing Loss. While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise. The Occupational Safety and Health Administration has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over 8 hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter.

Annoyance. Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. CNEL as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement about the relative annoyance of these different sources. A noise level of about 55 dBA CNEL is the threshold at which a substantial percentage of people begin to report annoyance1.

Groundborne Vibration

Sources of groundborne vibrations include natural phenomena (earthquakes, volcanic eruptions, sea waves, landslides, etc.) or man-made causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous (e.g. factory machinery) or transient (e.g. explosions). Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude, including Vibration Decibels (VdB), peak particle velocity (PPV), and the root mean square (RMS) velocity. VdB is the vibration velocity level in the decibel scale. PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave. The RMS velocity is defined as the average of the squared amplitude of the signal. The PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration.

Table 4.10-5: Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations, displays the reactions of people and the effects on buildings produced by continuous vibration levels. The annoyance levels shown in the table should be interpreted with care since vibration may be found to be annoying at much lower levels than those listed, depending on the level of activity or the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage. In high noise environments, which are more prevalent where groundborne vibration approaches perceptible levels, this rattling phenomenon may also be produced by loud airborne environmental noise causing induced vibration in exterior doors and windows.

[1] Federal Interagency Committee on Noise, *Federal Agency Review of Selected Airport Noise Analysis Issues*, August 1992.

Table 4.10-5: Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations

Maximum PPV (in/sec)	Vibration Annoyance Potential Criteria	Vibration Damage Potential Threshold Criteria	FTA Vibration Damage Criteria
0.008	-	Extremely fragile historic buildings, ruins, ancient monuments	-
0.01	Barely Perceptible	-	-
0.04	Distinctly Perceptible	-	-
0.1	Strongly Perceptible	Fragile buildings	-
0.12	-	-	Buildings extremely susceptible to vibration damage
0.2	-	-	Non-engineered timber and masonry buildings
0.25	-	Historic and some old buildings	-
0.3	-	Older residential structures	Engineered concrete and masonry (no plaster)
0.4	Severe	-	-
0.5	-	New residential structures, Modern industrial/commercial buildings	Reinforced-concrete, steel, or timber (no plaster)
PPV = peak particle velocity; in/sec = inches per second; FTA = Federal Transit Administration			
Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, 2020 and Federal Transit Administration, Transit Noise and Vibration Assessment Manual, 2018.			

Ground vibration can be a concern in instances where buildings shake, and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible. Common sources for groundborne vibration are planes, trains, and construction activities such as earth-moving which requires the use of heavy-duty earth moving equipment. For the purposes of this analysis, a PPV (in/sec) is used to evaluate construction-generated vibration for building damage and human complaints.

The Project Site is impacted by various noise sources. Mobile sources of noise, traffic along Pacific Coast Highway and Clarke Avenue to East Anaheim Street to the south of the site are the most common and significant sources of noise in the Project area. The primary sources of stationary noise near the Project Site include parking lot noise at the adjacent commercial properties, mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] units) operating at the nearby residential uses, and other urban-related activities (e.g., idling cars/trucks, pedestrians, car radios and music playing, dogs barking, etc.). The noise associated with these sources may represent a single event noise occurrence or short-term noise.

Noise Measurements

To quantify existing ambient noise levels in the Project area, Kimley-Horn conducted four short-term (10-minute) measurements on February 27, 2024, see **Appendix G: Park Tower Student Housing Noise Analysis**. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the Project Site. The 10-minute daytime measurements were taken between 10:50 a.m. and 11:59 a.m. The average noise levels and sources of noise measured at each location are listed in **Table 4.10-6: Noise Measurements** and shown on **Figure 4.10-1: Noise Measurement Locations**.

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FIGURE 4.10-1: Noise Measurement Locations

PARK TOWER STUDENT HOUSING PROJECT

Kimley»Horn

Table 4.10-6: Noise Measurements

Site	Location	Measurement Time	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)
Short-Term Noise Measurements (10-minute measurements)					
ST-1	Residential housing Northwest of Project Site along Granada Avenue	10:50 a.m. – 11:00 a.m.	58.3	50.1	70.4
ST-2	North Project Site boundary along Pacific Coast Highway	11:11 a.m.-11:21 a.m.	64.5	53.5	74.5
ST-3	Residential care center Northeast of Project Site along Pacific Coast Highway	11:49 a.m. – 11:59 a.m.	62.3	49.9	71.2
ST-4	South of Project Site	11:30 a.m.-11:40 a.m.	70.5	49.1	77.6
1. Daytime hours are from 7:00 a.m. to 10:00 p.m.					
Source: Noise measurements taken by Kimley-Horn and Associates, February 27, 2024. See **Appendix G: Park Tower Student Housing Noise Analysis** for noise measurement results.					

Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Residences, hospitals, schools, guest lodging, libraries, and churches are treated as the most sensitive to noise intrusion and therefore have more stringent noise exposure targets than do other uses, such as manufacturing or agricultural uses that are not subject to impacts such as sleep disturbance. Sensitive receptors near the Project Site are shown in **Table 4.10-7: Sensitive Receptors**.

Table 4.10-7: Sensitive Receptors

Receptor Description	Distance[1] and Direction from the Property Line of Project Site
Multi-Family Residential Dwellings	55 feet to the west
Single-Family Residential Dwellings	55 feet to the west
Rock Christian Fellowship	175 feet to the east
Cambrian Homecare	290 feet to the east
1. Distances are measured from the Project Site boundary to the property line. Source: Google Earth, 2024	

4.10.3 Impact Analysis

Methodology

This section summarizes the methods used to analyze construction noise, construction vibration, operational noise, and operational traffic noise. A more detailed explanation of the noise analysis methodology is provided in **Appendix G, Park Tower Student Housing Noise Analysis**.

Construction Noise

Construction noise estimates are based upon typical noise levels generated by construction equipment published by the Federal Transit Administration (FTA) and FHWA. Construction noise is assessed in dBA Leq. This unit is appropriate because Leq can be used to describe noise level from operation of each piece of equipment separately, and levels can be combined to represent the noise level from all equipment operating during a given period. The City's Noise Element relies on the FTA Transit Noise and Vibration Impact Assessment Manual (2018) (FTA Noise and Vibration Manual), which identifies a maximum 1-hour noise level standard of 90 dBA Leq at residential uses and 100 dBA Leq at commercial and industrial uses for short-term construction activities. Noise generated by short term construction activities below the FTA's maximum 1-hour noise level standard would have a less than significant impact.

Operational Noise

Reference noise level data are used to estimate the Project operational noise impacts from stationary sources. Noise levels were collected from published sources from similar types of activities and used to estimate noise levels expected with the Project's stationary sources. The reference noise levels are used to represent a worst-case noise environment as noise levels from stationary sources can vary throughout the day. LBMC Section 8.80.160 (refer to Table **4.10-1**) identifies exterior noise limits with a 50 dBA daytime threshold for District 1. Additionally, LBMC Section 8.80.160 (C) states that if measured ambient noise level exceeds the permissible noise exposure then the standard shall be increased by increments of 5 dBA. Therefore, in accordance with LBMC Section 8.80.160 (C), a significant noise impact would occur if the Project noise levels exceeded 55 dBA.

Vibration

Ground-borne vibration levels associated with construction activities for the Project were evaluated utilizing typical ground-borne vibration levels associated with construction equipment, obtained from FTA published data for construction equipment. Potential ground-borne vibration impacts related to Potential ground-borne vibration impacts related to building/structure damage and interference with existing off-site operations were evaluated, considering the distance from construction activities to nearby land uses and typically applied criteria for structural damage and human annoyance

Thresholds of Significance

The following significance criteria are based on currently adopted guidance provided by Appendix G of the CEQA Guidelines. For the purposes of this report, impacts would be potentially significant if the Project results in or causes:

- Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Generation of excessive ground-borne vibration or ground-borne noise levels;

- For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

Project Impacts

Threshold NOI-1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact NOI-1: Less Than Significant Impact.

Construction Noise Impacts

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. During construction, exterior noise levels could affect the buildings near the construction site.

Construction activities would include demolition, building construction, and architectural coating. Such activities may require dozers, and tractors/loaders/backhoes during demolition; cranes, forklifts, generator sets, tractors/loaders/backhoes, and welders during building construction; pavers, rollers, mixers, tractors/loaders/backhoes; and air compressors during architectural coating. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Typical noise levels associated with individual construction equipment are listed in **Table 4.10-8: Typical Construction Noise Levels.**

Table 4.10-8: Typical Construction Noise Levels

Equipment	Maximum Noise Level (dBA) at 50 feet from Source[1]
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Mobile	83
Dozer	85
Generator	82
Grader	85
Impact Wrench	85
Jack Hammer	88
Loader	80
Paver	85
Pneumatic Tool	85
Pump	77

Equipment	Maximum Noise Level (dBA) at 50 feet from Source[1]
Roller	85
Scarifier	83
Saw	76
Scraper	85
Shovel	82
Truck	84
Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.	

Construction activities would not take place between the hours of 7:00 p.m. and 7:00 a.m. in compliance with LBMC Section 8.80.202. As discussed above, the City's General Plan Noise Element utilizes the criteria from the FTA Transit Noise and Vibration Manual to establish significance thresholds. The FTA provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction. For residential uses, the daytime noise threshold is 90 dBA L_{eq} averaged over a 1-hour period ($L_{eq\ (1\text{-}hr)}$) and 100 dBA $L_{eq\ (1\text{-}hr)}$ at commercial and industrial uses. In compliance with the City's Municipal Code, it is assumed that construction would not occur during the noise-sensitive nighttime hours. The City's permitted hours of construction are required in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant impact.

Construction-related activities would temporarily increase ambient noise levels in the Project vicinity. Construction-related noise levels at and near the Project Site would fluctuate depending on the level and type of construction activity on a given day. During construction, exterior noise levels could affect the various uses surrounding the site. Construction activities would occur throughout the Project Site and would not be concentrated at a single point near sensitive receptors. Noise impacts for mobile construction equipment are typically assessed as emanating from the main construction activity area.[2] For the Project, the main construction activity area would be approximately 170 feet from the nearest sensitive receptor, the single-family and multi-family residences to the west. Noise levels typically attenuate (or drop off) at a rate of 6 dB per doubling of distance from point sources, such as industrial machinery.

The noise levels identified in **Table 4.10-9: Project Construction Noise Levels,** show the estimated exterior construction noise at the nearest sensitive receptors to the west and east of the Project Site. Based on calculations using the Roadway Construction Noise Model (RCNM), construction noise levels would range from approximately 58.6 dBA L_{eq} to 75.1 dBA L_{eq} at the nearest sensitive receptors. Thus, the Project construction noise levels would be consistent with the FTA's construction noise thresholds.

[2] For the purposes of this analysis, the main construction activity area is defined as the center of the Project Site due to the building placement and orientation. Although some construction activities may occur at distances closer than 170 feet from the nearest properties, construction equipment would be dispersed throughout the Project Site during various construction activities. Therefore, main construction activity area represents the most appropriate distance based on the sporadic nature of construction activities.

Table 4.10-9 Project Construction Noise Levels

Construction Phase	Receptor Location		Worst Case Modeled Noise Level, dBA L_{eq}[2]	FTA Noise Threshold, dBA L_{eq}[3]	Exceeds Noise Threshold?
	Land Use	Distance (feet)[1]			
Demolition	Residential	170	75.1	90	**No**
	Residential	170	75.1		**No**
	Church	260	71.4		**No**
	Homecare	405	67.6		**No**
Interior/Exterior Building Construction	Residential	170	74.9	90	**No**
	Residential	170	74.9		**No**
	Church	260	71.2		**No**
	Homecare	405	67.3		**No**
Architectural Coating	Residential	170	66.1	90	**No**
	Residential	170	66.1		**No**
	Church	260	62.4		**No**
	Homecare	405	58.6		**No**

1. Distance measured from the property line of the Project Site to the receptor's nearest property line.

2. Modeled noise levels conservatively assume the simultaneous operation of all pieces of equipment.

3. FTA temporary construction noise criteria of 90 dBA L_{eq} is used to determine impact significance at noise sensitive receptors.

Source: Source: Federal Highway Administration, *Roadway Construction Noise Model,* 2006. Refer to **Appendix G Park Tower Student Housing Noise Analysis** for noise modeling results.

Operational Noise Impacts

As discussed above, the closest sensitive receptors to the Project Site are multi-family and single family residences located 55 feet to the west of the Project Site on Granada Avenue. LBMC Section 8.80.160 (refer to **Table 4.10-2**) identifies exterior noise limits with a 50 dBA daytime threshold for District 1. Additionally, LBMC Section 8.80.160 (C) states that if measured ambient noise level exceeds the permissible noise exposure then the standard shall be increased by increments of 5 dBA. As shown in Table 3, the measured ambient noise at the nearest sensitive receptors to the Project Site exceeds 50 dBA. Therefore, in accordance with LBMC Section 8.80.160 (C), a significant noise impact would occur if the Project noise levels exceed 55 dBA.

On-Site Operations

Project implementation would introduce new noise sources in the Project vicinity. The Project's primary noise sources that could potentially impact nearby noise-sensitive land uses include

parking, mechanical equipment (e.g., HVAC, etc.), trash/recycling truck pickup noise, and recreational activities.

Parking

Parking stalls would be located throughout the three levels of subterranean parking. The parking stalls would be enclosed within the building, therefore parking lot noise would be contained within the building and would not increase exterior noise levels. Noise levels generated by Project parking and vehicle access would not result in the generation of substantial permanent increase in ambient noise levels in the vicinity of the Project. The impacts would be less than significant, and no mitigation measures are needed.

Mechanical Equipment

Mechanical equipment (e.g., heating equipment and air condition [HVAC] equipment) typically generates noise levels of approximately 52 dBA at 50 feet.[3] The nearest mechanical equipment would be approximately 55 feet north from the nearest residential sensitive receptor. At this distance, HVAC equipment noise would be approximately 51.2 dBA based on distance attenuation alone (using the inverse square law of sound propagation)[4] and would not exceed the 55 dBA threshold for HVAC equipment noise measured at the property line, set forth in LBMC Section 8.80.160 (C). Therefore, the Project would result in a less than significant impact related to mechanical noise levels.

Recreational Activities

The Project area may include some crowd noise caused by the wading pool which includes pool equipment and pool activities. Pool mechanical equipment would produce constant noise levels of 55 dBA at 50 feet from the source.[5] The nearest residential use is 95 feet east of the recreational activity. At this distance, recreational noise levels would be 49.4 dBA based on distance attenuation alone (using the inverse square law of noise propagation).[6] This would not exceed the City's exterior noise limit of 55 dBA. Additionally, noise levels associated with recreational swimming are typically 57 dBA at 75 feet from the edge of the pool for wading activities. At this distance, recreational swimming noise levels would be attenuated to 54.9 dBA and would not exceed the City's exterior noise limit of 55 dBA. Therefore, impacts associated with recreational activities would be less than significant.

Landscape Maintenance Activities

Development and operation of the Project includes new landscaping that would require periodic maintenance. Noise generated by a gasoline-powered lawnmower is estimated to be approximately 70 dBA at a distance of 5 feet. The nearest residential use is 55 feet east of the Project Site of and at this distance, landscape maintenance activities would be 49.2 dBA. Actual noise levels over time resulting from landscape maintenance activities would not exceed the LBMC exterior noise limits for District 1. Further, maintenance activities would operate during daytime hours for brief periods of time as allowed by the LBMC and would not permanently increase ambient noise levels in the Project vicinity and would be consistent with activities that currently occur at the surrounding uses. Therefore, with adherence to the LBMC, impacts associated with landscape maintenance would be less than significant.

[3] Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, June 26, 2015.
[4] Sound level reduces by 6 dB for every doubling of distance.
[5] Hayne, M.J., et al. 2006. *Prediction of Crowd Noise, Acoustics.*
[6] Sound level reduces by 6 dB for every doubling of distance.

Operational Traffic Noise

According to the Project's Traffic Generation Analysis and Vehicle Miles Traveled Screening (Kimley-Horn, 2024), the Park Tower Student Housing Project would result in approximately 1,695 daily trips. The existing use on site generates 1,188 daily trips. Therefore, compared to the existing condition, the Project is anticipated to generate 507 net daily trips. The project is expected to generate a net of 291 average daily trips, which would result in noise increases on project area roadways. In general, a traffic noise increase of less than 3 dBA is barely perceptible to people, while a 5 dBA increase is readily noticeable (Caltrans, 2013). Generally, traffic volumes on project area roadways would have to approximately double for the resulting traffic noise levels to increase by 3 dBA. According to Citywide Traffic Flow maps, the roadways in the project area have between 10,000 and 26,300 daily trips. Therefore, the Project would not result in a doubling of trips and permanent increases in ambient noise levels more than 3 dBA would not occur. Therefore, there would not be any new operational traffic noise impacts.

Threshold NOI-2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Impact NOI-2: Less Than Significant Impact.

Increases in ground borne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction would have the potential to result in varying degrees of temporary ground borne vibration, depending on the specific construction equipment used and the operations involved.

The FTA has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 in/sec) appears to be conservative. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. For example, for a building that is constructed with reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 0.50 in/sec is considered safe and would not result in any construction vibration damage. This evaluation uses the FTA architectural damage criterion for continuous vibrations at non-engineered timber and masonry buildings of 0.2 inch-per-second peak particle velocity (PPV) and human annoyance criterion of 0.4 inch-per-second PPV in accordance with Caltrans guidance.[7]

Table 4.10-10: Typical Construction Equipment Vibration Levels lists vibration levels at 25 feet (reference level) for typical construction equipment. Ground borne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. As indicated in **Table 4.10-10**, based on FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.003 to 0.089in/sec PPV at 25 feet from the source of activity. The nearest sensitive receptors are multi-family and single-family residences approximately 55 feet from the Project. As

[7] California Department of Transportation, *Transportation and Construction Vibration Guidance Manual, Table 20*, September 2013.

shown in **Table 4.10-10**, construction equipment vibration velocities would not exceed the FTA's 0.20 PPV threshold.

Table 4.10-10: Typical Construction Equipment Vibration Levels

Equipment	Typical Level (dBA) 25 feet from the Source (Reference Level)
Large Bulldozer	0.089
Loaded Trucks	0.076
Rock Breaker	0.059
Jackhammer	0.035
Small Bulldozer/Tractors	0.003
1. Calculated using the following formula: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance; PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018; D = the distance from the equipment to the receiver.	
Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018.	

Threshold NOI-3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Impact NOI-3: No Impact.

The Project Site is located within two miles of an airport or airstrip. The closest airport is Long Beach Airport located roughly 1.6 miles north of the Project Site. Review of the Long Beach Airport's Influence Area Map indicates the Project Site is outside of the Airport Influence Area (AIA) boundaries.[8] Additionally, there are no other airports or airstrips within 2.0 miles of the Project Site. As such, the Project Site would not expose workers in the Project area to excessive noise levels from airport operations. Accordingly, there would be no impact.

Cumulative Impacts

Construction

Section 3.3, Cumulative Development, identifies no related projects within an approximately 1-mile radius of the Project Site that are planned, under construction, or recently completed. However, for purposes of identifying cumulative noise impacts, the geographic scope is focused on the Project Site and the surrounding area, including nearby sensitive receptors.

There are no cumulative projects identified within 1-mile radius of the Project Site, therefore cumulative impacts would be less than significant. Therefore, it is highly unlikely that construction-related noise would be cumulatively considerable. The Project construction would comply with Section 8.80.202 of the LBMC which limits construction hours of 7:00 a.m. and 7:00 p.m. There would be periodic, temporary, noise that would cease upon completion of construction activities. The Project could contribute to other proximate construction noise impacts if construction

[8] County of Los Angeles, Long Beach Airport: Airport Influence Area, 2003, https://case.planning.lacounty.gov/assets/upl/project/aluc_airport-long-beach.pdf. Accessed June 6, 2024.

activities were conducted concurrently. However, based on the noise analysis above, the Project's construction-related noise impacts would be in compliance with local regulations. Further, construction noise levels throughout Project implementation would not exceed FTA noise standards or disturb existing site conditions.

Operations

There are no cumulative projects identified within 1-mile radius of the Project Site, therefore cumulative impacts for operational noise would be less than significant. As mentioned above, Project implementation would introduce new parking lot noise, mechanical equipment noise, and landscape maintenance noise. Project related operational noise impacts would be less than significant. As there are no cumulative projects identified within 1-mile radius of the Project Site, there would be no impacts. Therefore, the Project would not result in significant cumulative effects related to operational noise.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Project-specific and cumulative impacts related to noise would be less than significant.

4.11 Population and Housing

This Section of the EIR addresses potential impacts on population and housing that could occur due to construction and operation of the Project. The analysis focuses on potential effects of the Project's contribution to population and housing growth within the geographical boundaries of the City) by taking into account population and housing projections established in the Southern California Association of Governments (SCAG) 2024–2050 Regional Transportation Plan and Sustainable Communities Strategy (2024 RTP/SCS) and SCAG's 6th Cycle Regional Housing Needs Assessment (RHNA), as well as policies established in the City's General Plan. This Section analyzes the Project's effects on population, housing, and employment as compared to adopted growth forecasts; and relevant policies and programs regarding planning for future development.

4.11.1 Regulatory Setting

State

Housing Element Law: Government Code Sections 65583 and 65584(a)(1)

Section 65583 of the Government Code requires cities and counties to prepare a housing element as one of the State-mandated elements of the General Plan, with specific direction on its content. Pursuant to section 65584(a)(1), the California Department of Housing and Community Development (HCD) is responsible for determining the regional housing needs assessment (segmented by income levels) for each region's planning body known as a "council of governments" (COG), the SCAG being the COG serving the Southern California area. HCD prepares an initial housing needs assessment and then coordinates with each COG in order to arrive at the final RHNA. To date, there have been four previous housing element update "cycles." California is now in its sixth "housing-element update cycle." The SCAG RHNA and the City's General Plan Housing Element are discussed further below.

Housing Crisis Act of 2019 (Senate Bill 330, Skinner)

On October 9, 2019, Governor Newsom signed into law the Housing Crisis Act of 2019 (Senate Bill [SB] 330). SB 330 seeks to speed up housing production in the next half decade by eliminating some of the most common entitlement impediments to the creation of new housing, including delays in the local permitting process and cities enacting new requirements after an application is complete and undergoing local review—both of which can exacerbate the cost and uncertainty that sponsors of housing projects face. In addition to speeding up the timeline to obtain building permits, the bill prohibits local governments from reducing the number of homes that can be built through down-planning or down-zoning or the introduction of new discretionary design guidelines. The bill is in effect as of January 1, 2020, but is temporary in nature as the bill's provisions expire on January 1, 2025.

Regional

Southern California Association of Governments (SCAG)

The Project Site is located within the jurisdiction of SCAG. Pursuant to federal and State law, SCAG serves as the COG, a Regional Transportation Planning Agency, and the Metropolitan Planning Organization (MPO) for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and

economic development. Specifically, SCAG is responsible for preparing the Regional Comprehensive Plan (RCP), RTP/SCS, and RHNA, in coordination with other State and local agencies. These documents include population, employment, and housing projections for the region and its 15 subregions. Subregions play an important role as a conduit between SCAG and cities and counties of the region by participating and providing input on SCAG's planning activities, which helps the Regional Council and its committees make better-informed decisions. The Project Site is located within the Los Angeles Subregion of the overall SCAG area.

SCAG is tasked with providing demographic projections for use by local agencies and public service and utility agencies in determining future service demands. Projections in the SCAG 2024 RTP/SCS serve as the basis for demographic estimates in this analysis of Project consistency with growth projections. The findings regarding growth in the region are consistent with the methodologies prescribed by SCAG and reflect SCAG goals and policies.

SCAG data is periodically updated to reflect changes in development activity and provisions of local jurisdictions (e.g., zoning changes). Through these updates, public agencies have advance information regarding changes in growth that must be addressed in planning for their provision of services. Changes in the growth rates are reflected in the new projections for service and utilities planning through the long-term time horizon.

SCAG Connect SoCal (2024 RTP/SCS)

The 2024 RTP/SCS, known as Connect SoCal, was developed through a four-year planning process that involved rigorous technical analysis, extensive stakeholder engagement and robust policy discussions with local elected leaders, who make up SCAG's policy committees and Regional Council. The 2024 RTP/SCS charts a path toward a more mobile, sustainable, and prosperous region by making key connections: between transportation networks, between planning strategies, and between the people whose collaboration can make plans a reality.

The 2024 RTP/SCS embodies a collective vision for the region's future, through the horizon year of 2050. It is developed with input from a wide range of constituents and stakeholders within the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura, including public agencies, community organizations, elected officials, tribal governments, the business community and the general public. The 2024 RTP/SCS is an important planning document for the region, allowing public agencies who implement transportation projects to do so in a coordinated manner, while qualifying for federal and State funding. The plan includes robust financial analysis that considers operations and maintenance costs to ensure the existing transportation system's reliability, longevity, resilience and cost effectiveness. In addition, the 2024 RTP/SCS is supported by a combination of transportation and land use strategies that outline how the region can achieve California's greenhouse gas emission reduction goals and meet federal Clean Air Act requirements. The plan also strives to achieve broader regional objectives, such as the preservation of natural lands, improvement of public health, increased roadway safety, support for the region's vital goods movement industries and more efficient use of resources.

In addition, the 2024 RTP/SCS establishes policies pertaining to regional growth and efficient development patterns to reduce development impacts on traffic congestion and related increases in air quality emissions. These policies are discussed in detail in **Section 4.9, Land Use and Planning**.

The RHNA is mandated by State Housing Element Law as part of the periodic process of updating general plan housing elements. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods, or cycles. In prior cycles, factors such as household growth

and household income distribution were the primary factors considered in determining a jurisdiction's RHNA allocation. SCAG's 6th Cycle RHNA quantifies the regional need for housing and then allocates the regional need to each jurisdiction for a planning period between October 2021 and October 2029. The 6th Cycle RHNA is focused on existing need (current housing shortages and overcrowding) plus projected growth, which takes into account factors beyond what was used to determine the 2024 RTP/SCS's projected growth.[1] Therefore, the 6th Cycle RHNA allocation for the City results in a higher allocation of housing than what is represented in the 2024 RTP/SCS, which is focused solely on projected or future growth. For the 6th RHNA Cycle, SCAG considers other factors in addition to household growth. These factors include transit accessibility, job accessibility, and indicators that influence a community's environmental, educational, and economic resource accessibility.

On October 15, 2019, SCAG received the Final Regional Determination from HCD. On November 7, 2019, SCAG Regional Council approved a Draft RHNA Allocation Methodology for HCD's review. The Regional Council approved the Final RHNA Methodology on March 5, 2020 and released the Draft RHNA Allocation by jurisdictions. The RHNA underwent Appeals Board Hearings throughout January 2021. In February 2021, the RHNA Appeals Board concluded its determination of appeals and issued the proposed final RHNA Allocation Plan and recommended the Plan for approval by SCAG's Community, Economic & Human Development (CEHD) Committee and Regional Council. The final 6th Cycle RHNA methodology and allocations were adopted by the Regional Council on March 4, 2021 and is currently pending HCD approval. As part of the RHNA draft allocations, the City's allocation of housing between October 2021 and October 2029 is 26,502 units.[2]

Consistent with the State Housing Element Law, the primary objectives the 6th Cycle RHNA allocation plan are:

- Increasing the housing supply and mix of housing types, tenure and affordability within each region in an equitable manner.
- Promoting infill development and socioeconomic equity, the projection of environmental and agricultural resources, and the encouragement of efficient development patterns.
- Promoting an improved interregional relationship between jobs and housing.
- Allocating a lower proportion of housing need in income categories in jurisdictions that have a disproportionately high share in comparison to the county distribution.
- Affirmatively furthering fair housing.

Local jurisdictions are required to plan and zone to accommodate their respective RHNA allocation (housing units) by income categories through the process of updating the Housing Elements of their General Plans. Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment, and housing unit growth. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that collectively the region and sub region can grow in ways that enhance quality of life, improve

1 SCAG, RHNA Allocation Plan, 2020, https://scag.ca.gov/sites/main/files/file-attachments/6th_cycle_final_rhna_allocation_plan_070121.pdf?1646938785. Accessed June 5, 2024.
2 SCAG, RHNA Allocation Plan.

access to jobs, promotes transportation mobility, addresses social equity, and fair share housing needs.

Local

City of Long Beach General Plan – Land Use Element

The Land Use Element (2019) of the City's General Plan serves as a guide to the City's future development by designating the location, and types and intensity of development. The following policies related to population and housing apply to the Project:

- LU Policy 9-1: Protect neighborhoods from the encroachment of incompatible activities or land uses that may have negative impacts on residential living environments.
- LU Policy 16-15: Encourage the design of warehouse and distribution center check-in points that minimize queuing outside of the facility. The design shall also locate truck traffic within the site away from the property line(s) closest to its residential or sensitive receptor neighbors.

City of Long Beach General Plan – Housing Element

The Housing Element of the City's General Plan builds on previous City plans, goals, objectives, and strategies to ensure that the City meets the housing needs of current and future Long Beach residents and provides fair housing options for all. The 2021-2029 Housing Element adopted by the Long Beach City Council in February 2022 and certified by the California Department of Housing and Community Development in April 2022.

The following policies related to population and housing apply to the Project:

- HE Policy 1.6: Facilitate adaptive reuse of existing structures for residential purposes.

4.11.2 Environmental Setting

Table 4.11-1: Population, Housing, and Employment Forecasts for the City of Long Beach, identifies historical and projected increases in population, housing, and employment growth. **Table 4.11-1** includes data for the years 2019 and 2050, which are the base and horizon years for demographics and growth forecasts in SCAG's 2024 RTP/SCS, respectively; and the year 2026, which is the buildout year for the Project. Existing and projected population, housing, and employment are discussed in more detail below.

Table 4.11-1: Population, Housing, and Employment Forecasts for the City of Long Beach

	2019	2050	2050-2019 Difference	2050-2019 Percent Difference	2026[1]	2026-2019 Difference	2026-2019 Percent Difference
Population	467,900	495,349[2]	27,449	5.9	474,099	6,199	1.3
Households	169,300	197,300	28,000	16.5	175,623	6,323	3.7
Employment	195,300	213,400	18,100	9.3	199,388	4,088	2.1

Notes:
1. The projected estimates in population, households, and employment for the year 2026 were interpolated from population, households, and employment estimations for the years 2019 and 2050 from the 2024 RTP/SCS.
2. A rough estimate of the future population of the City based on SCAG's household forecast was derived using a County-level population to housing ratio from the 2024 RTP/SCS and applying it to the City's future household growth; see Existing and Projected Population below for additional information on the methodology of estimating the City's projected population.
Source:
SCAG, 2045-2050 RTP/SCS Demographics and Growth Forecast Technical Report, 2024, https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839.

Existing and Projected Population

According to the State of California's Department of Finance (DOF), the population of Los Angeles County has decreased from 10,014,009 in 2020 to 9,824,091 as of January 1, 2024. SCAG estimates that the population of Los Angeles County will increase to 10,793,000 persons in 2050.[3] As of January 1, 2024, the population of the City was 458,813 people.

A rough estimate of the future population of the City based on SCAG's household forecast was derived using a County-level population to housing ratio from the 2024 RTP/SCS and applying it to the City's future household growth. As shown in **Table 4.11-1**, the 2024 RTP/SCS indicates that the 2019 to 2050 projected increase in population and housing is 747,000 persons and 762,000 households, respectively, resulting in a County-level population-housing ratio of approximately 0.98. Multiplying this County-level population-housing ratio of 0.98 to the 2019 to 2050 projected increase in the number of households in the City (28,000 households) results in a corresponding City-level population growth by 27,449 persons in the years 2019 to 2050. This increase results in an estimated City population of 495,349 persons in 2050.

The estimate of the projected population of the City in the year 2026, the Project's buildout year, was interpolated from the population estimates for the years 2019 and 2050 from the 2024 RTP/SCS. As shown in **Table 4.11-1**, the City would anticipate a growth in the City's population from 467,900 in 2019 to 474,099 in 2026.

Existing and Projected Housing

SCAG estimates that the number of households within Los Angeles County will increase from 3,393,000 in 2019 to 4,155,000 in 2050.

As shown in **Table 4.11-1**, SCAG's jurisdiction-level growth forecasts for the City anticipate a growth in the City's number of households from 169,300 in 2019 to 197,300 in 2050.

The estimated projected number of households for the City in the year 2026, the Project's buildout year, was interpolated from the household estimates for the years 2019 and 2050 from the 2024 RTP/SCS. As shown in **Table 4.11-1**, the City would anticipate a growth in the City's number of households from 169,300 in 2019 to 175,623 in 2026.

Existing and Projected Employment

Total employment within Los Angeles County is anticipated by SCAG to increase from 5,031,000 in 2019 to 5,461,000 in 2050.

SCAG jurisdictional-level growth forecasts for the City of Long Beach anticipate a growth in the City's employment from 195,300 in 2019 to 213,400 in 2050.

The estimated projected level of employment for the City in the year 2026, the Project's buildout year, was interpolated from the employment estimates for the years 2019 and 2050 from the 2024 RTP/SCS. As shown in **Table 4.11-1**, the City would anticipate a growth in the City's employment levels from 195,300 in 2019 to 199,388 in 2026.

[3] State of California Department of Finance (DOF), E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2024, https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/. Accessed August 20, 2024.

4.11.3 Impact Analysis

Methodology

Effects to population and housing associated with the Project were evaluated employing data provided by SCAG and the California Department of Finance, as well as local land use policies.

Thresholds of Significance

An impact is considered significant if the Project would:

- Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

As discussed in the Initial Study, provided in **Appendix A** of this EIR, and in **Section 6.0, Other CEQA Considerations**, the Project would have no impact related to the displacement of existing people or housing. As such, no further analysis of this topic in this Section is necessary.

Project Impacts

Threshold POP-1: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Impact POP-1: Less than Significant Impact.

The Project would develop a seven-story residential building for students. The Project would include 149 student residential suites (593 beds), which would result in a corresponding increase of approximately 593 students.

As shown in **Table 4.11-1**, growth forecasts contained in SCAG's 2024 RTP/SCS indicate that the number of households within the City will increase from 169,300 in 2019 to 197,300 in 2050, representing an increase of 28,000 households. As shown below in **Table 4.11-2: Project Increase Compared to SCAG Projected Growth**, the Project would include 149 units, which represents 0.5 percent of the anticipated increase for the City by 2050. Additionally, as mentioned above, and as outlined in the City's General Plan Housing Element, the City's RNHA allocation of housing between October 2021 and October 2029 has an objective of constructing 26,502 new units. The Project's proposed 149 student residential suites would represent approximately 0.6 percent of the number of new units planned to be constructed by the City per the Housing Element.

Table 4.11-2: Project Increase Compared to SCAG Projected Growth

Range[1]	Project Increase	SCAG Projected Growth	Project Percent of SCAG Projected Growth
Population			
2019-2026	593	6,199	9.6
2019-2050	593	27,449	2.2
Households			
2019-2026	149	6,323	2.4
2019-2050	149	28,000	0.5

Notes:
1. 2019 and 2050 are the base and horizon years for demographics and growth forecast estimates in SCAG's 2024 RTP/SCS, respectively; and 2026 is the Project's buildout year.
Source:
SCAG, 2045-2050 RTP/SCS Demographics and Growth Forecast Technical Report, 2024, https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839.

As shown in **Table 4.11-1**, the estimated population of the City in 2050, which was derived using a County-level population to housing ratio from the 2024 RTP/SCS and applying it to the City's future household growth, is 495,349 persons. This represents a total increase of 5.9 percent, or 27,449 persons, from approximately 467,900 persons in 2019. The population in the Project's proposed buildout year (2026) is estimated to be 474,099 persons.

As shown in **Table 4.11-2**, the Project's anticipated population growth (593 persons) would represent approximately 9.6 percent of the City's anticipated growth between 2019 and 2026, and approximately 2.2 percent of the City's anticipated growth between 2019 and 2050. Thus, the Project's estimated population growth would be within regional growth projections for the City.

Additionally, the Project's anticipated household growth (149 beds) would represent approximately 2.4 percent of the City's anticipated household growth between 2019 and 2026, and approximately 0.5 percent of the City's anticipated household growth between 2019 and 2050. Thus, the Project's estimated household growth would be within regional growth projections for the City.

It is anticipated that construction workers and future employees of the Project would reside within the City and surrounding area, and commute to work. The Project would include the adaptive reuse of an existing office building to a student residential building and associated on-site improvements. The Project would not include components such as the extension of roads or existing infrastructure that would result in the indirect population growth within the City.

Potential population growth impacts are also assessed based on a project's consistency with adopted plans that have addressed growth management from a local and regional standpoint. According to the General Plan, the Project Site's Placetype is Community Commercial (CC). Residential uses are not allowed under this PlaceType. The Project requires approval of a General Plan Amendment/Map Change to change the General Plan CC Placetype to Neighborhood Serving Center or Corridor (NSC-C), which allows a density of 125 persons per acre.

The Project Site is also zoned Community Commercial Automobile-Oriented (CCA). Pursuant to Long Beach Municipal Code Section 21.32.020, the CCA Zoning District permits retail and service uses for an entire community including convenience and comparison shopping for goods and associated services. The Project would also require a Zoning Code Amendment/Map Change to change the existing zone from C to Mixed-Use (MU-3) to allow for the Project's student residential uses and to enable the Project to take advantage of the adaptive reuse development standards.

The Project would also require the approval of a Conditional Use Permit (CUP) to allow the "Special Group Residence" and Site Plan review of adaptive reuse.

Upon the City's approval of the Project, the Project would be consistent with the NSC-C land use designation and MU-3 zoning designation.

Overall, although the Project may result in direct population growth from future residents relocating to the City, the Project would not induce substantial unplanned population growth exceeding regional population projections. Therefore, the Project would not induce substantial unplanned population growth and impacts would be less than significant.

Cumulative Impacts

Section 3.3, Cumulative Development*,* identifies no related projects within an approximately 1-mile radius of the Project Site that are planned, under construction, or have been recently completed. However, for purposes of this analysis, the geographic scope would be the City of Long Beach.

As discussed in **Section 4.11.3, Impact Analysis**, the Project would not induce substantial population growth within the City. The Project would not include components such as the extension of roads or existing infrastructure that would result in indirect growth within the City. Furthermore, the existing buildings on-site do not provide housing, nor would redevelopment of the Project Site result in displacement of people or housing.

Table 4.11-1 identifies projected increases in population growth. The Project will meet a cumulative demand of housing that will result from the City's projected increases in population growth. Furthermore, the Project will serve an existing demand for housing that will result from the City's projected future population, providing employment opportunities for the City and the surrounding community. Therefore, implementation of the Project would not result in a cumulatively significant population or housing impact and cumulative impacts from related projects are considered less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Project-specific and cumulative impacts related to population and housing would be less than significant.

4.12 Transportation

This Section of the EIR addresses the potential impacts to transportation associated with implementation of the Project. This Section includes a description of existing transportation and circulation conditions in the Project vicinity, a summary of applicable regulations related to transportation, and an evaluation of the potential transportation and traffic impacts that would be generated during construction and operation of the Project. The evaluation of transportation impacts is based on the Trip Generation Analysis and Vehicle Miles Traveled Screening Technical Memorandum (TGA VMT Memorandum) prepared by Kimley-Horn and Associates, Inc. on August 20, 2024, which is contained in **Appendix H, Trip Generation Analysis and Vehicle Miles Traveled Screening Technical Memorandum.**

4.12.1 Regulatory Setting

State

Senate Bill 743

California Senate Bill (SB) 743, which was signed into law in 2013, initiated an update to the California Environmental Quality Act (CEQA) Guidelines to change how lead agencies evaluate transportation impacts under CEQA, with the goal of better measuring the actual transportation-related environmental impacts of any given project. Traditionally, transportation impacts have been evaluated by examining whether the project is likely to cause automobile delay at intersections and congestion on nearby individual highway segments, and whether this delay will exceed a certain amount (this is known as Level of Service or LOS analysis). As of July 1, 2020, agencies analyzing the transportation impacts of new projects must use the Vehicle Miles Traveled (VMT) metric instead of LOS in evaluating traffic impacts in CEQA documents. VMT measures how much actual auto travel (additional miles driven) a project would add to California roads.

Assembly Bill 2097

Assembly Bill (AB) 2097 is a California law that prohibits public agencies or cities from imposing a minimum automobile parking requirement on most development projects located within a half-mile radius of a major transit stop.

Projects located within a half-mile of a major transit stop are generally eligible for the automobile parking reduction provided by AB 2097. This includes residential, commercial, and industrial projects, but does not include hotels, motels, bed and breakfast inns, or other transient lodgings. The State does give local agencies the option to impose minimum parking requirements in limited instances, provided that one of the following three findings can be substantiated in the affirmative to necessitate minimum parking requirements:

- The project furthers the City's ability to meet its share of the Regional Housing Needs Assessment (RHNA) for low and very low income households;
- The project directly supports the City's ability to meet any special housing needs for the elderly or persons with disabilities, or;
- The project is located within one-half mile of existing residential or commercial parking.

The State law offers a 30-day timeline to formally invoke such findings. However, these findings may not be made for projects that meet the following criteria:

- Projects that reserve 20 percent or more of the total dwelling units for very low-, low-, or moderate-income households, students, the elderly, or persons with disabilities;
- Projects that contain fewer than 20 dwelling units, or;
- Projects that are subject to other parking reductions of any other applicable law (by satisfying the applicable eligibility requirements).[1]

Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a Joint Powers Authority under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. Generally, SCAG develops long-range regional transportation plans including sustainable communities' strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations, and a portion of the South Coast Air Quality management plans. SCAG also developed the Regional Comprehensive Plan, the Regional Housing Needs Assessment (RHNA), and the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (2024 RTP/SCS).

SCAG 2024 RTP/SCS

On September 30, 2008, SB 375 was passed to help achieve AB 32 goals related to the reduction of greenhouse gases (GHGs) through the regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments, (2) regional allocation of the obligation for cities and counties to zone for housing, and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for the California Air Resources Control Board (CARB) to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires MPOs to prepare an SCS within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region.

Every four years, SCAG updates the RTP/SCS. The most recent RTP/SCS outlines a vision for a more resilient and equitable future and contains investment, policies and strategies for achieving the region's shared goals through 2050. The 2024 RTP/SCS includes elements that are organized within the pillars of Mobility, Communities, Environment and Economy. These goals are not mutually exclusive, they are mutually reinforcing. For example, the decisions and actions taken to achieve mobility goals can also help to achieve and support environmental goals. The plan was approved by SCAG's Regional Council in April 2024.

[1] City of Los Angeles, Assembly Bill 2097, https://planning.lacity.gov/project-review/assembly-bill-2097. Accessed August 23, 2024.

Local

City of Long Beach General Plan

The Long Beach General Plan (General Plan) includes goals, policies, and directions to achieve the City's vision of the community and future development. The General Plan includes 11 elements that have been updated at various points between 1966 and 2023. The elements focus on: Air Quality, Conservation, Historic Preservation, Housing, Land Use, Mobility, Noise, Open Space and Recreation, Public Safety, Seismic Safety, and Urban Design.

The General Plan established the following goals in order to an ensure adequate, multimodal transportation system within the City that are potentially applicable to the Project:

Mobility Element

- Strategy No. 1: Establish a network of complete streets that complements the related street types.
    - MOP Policy 1-9: Increase mode shift of transit, pedestrians, and bicycles.
    - MOP Policy 1-13: Increase multimodal access to major employers and educational institutions, including Long Beach Community.
- Strategy No. 2: Reconfigure streets to emphasize their modal priorities.
    - MOP Policy 2-15: Ensure that all new development is consistent with the applicable provisions of the Bicycle Master Plan.
    - MOP Policy 2-17: Ensure safe, convenient, and adequate, on- and off-street bicycle parking facilities to accommodate and encourage residents to cycle for commuting and daily needs.
- Strategy No. 5: Reduce the environmental impacts of the transportation system.
    - MOP Policy 5-6: Support the development of a network of public and private alternative fuel vehicle charging/ fueling stations Citywide.
- Strategy No. 6: Manage the supply of parking.
    - MOP Policy 6-11: Encourage the use of transit, carpooling, and walking to reduce the need for parking.
    - MOP Policy 6-12: Promote transit-oriented development with reduced parking requirements around appropriate transit hubs and stations to facilitate the use of available transit services.
    - MOP Policy 6-13: Consider reducing parking requirements for mixed-use developments, for developments providing shared parking or a comprehensive Transportation Demand Management (TDM) Program, or developments located near major transit hubs.

Bicycle Master Plan

The City's Bicycle Master Plan is compliant with AB 32 and the Complete Streets Act. The Bicycle Master Plan expands upon the City's General Plan Mobility Element by providing further details on bicycle planning and design. It also recommends a series of projects and programs to be

implemented by the City in the next few decades. The Bicycle Master Plan updated the former plan, taking advantage of new innovative bicycle planning and bikeway design solutions, to guide City staff in prioritizing resources when implementing future projects and programs, and finally, to make the City eligible for more outside funding.

City of Long Beach Traffic Impact Analysis Guidelines

Project applicants in the Long Beach are required to prepare a Traffic Impact Analysis (TIA) to analyze the traffic and circulation impacts of proposed development projects to comply with City regulations and CEQA. Per Section 1.3 of the City's TIA Guidelines, traffic impact studies are required whenever there is potential for a significant impact under a local policy or CEQA. Generally, a TIA may be required for any project in Long Beach that is expected to generate 500 or more net new daily trips, including both inbound and outbound trips. The TIA Guidelines provide direction for project review consistent with the General Plan Mobility Element vision that "(p)lans, maintains, and operates mobility systems consistent with the principles of complete streets, active living, and sustainable community design." The TIA Guidelines provide a suggested format and methodology for TIAs and establish procedures to ensure consistency of analysis and adequacy of information presented on behalf of a project.

City of Long Beach Municipal Code

Construction Traffic

Long Beach Municipal Code (LBMC) Chapter 8.80.202 limits allowable times of construction activities to between the hours of 7:00 A.M. and 7:00 P.M. on weekdays and from 9:00 A.M. to 6:00 P.M. on Saturdays and national holidays. No construction is permitted on Sundays.

Vehicle Parking Requirements

LBMC Chapter 21.41 establishes regulations for parking and loading to ensure that vehicle traffic and loading activities associated with a use do not interfere with circulation on public rights-of-way or circulation within required parking areas and to ensure that an adequate number of parking spaces is provided to serve the use of a specific site without causing traffic congestion.

4.12.2 Environmental Setting

Regional Access

Primary regional vehicular access is provided by the Pacific Coast Highway and the San Diego Freeway (I-405) located 1.4 miles north of the Project Site. Pacific Coast Highway runs along the coast of California in a north-south orientation, with its southern terminus near the City of Dana Point in Orange County and its northern terminus near the census-designated place of Leggett in Mendocino County. The Project Site connects to the Pacific Coast Highway via Clark Avenue and East Anaheim Street. The San Diego Freeway is a north-south highway that runs from the City of Irvine to the neighborhood of Granada Hills in the City of Los Angeles.

Local Streets

The Project Site is bounded Pacific Coast Highway to the north and east, East Anaheim Street to the south, and Clark Avenue to the west.

Pacific Coast Highway

Pacific Coast Highway serves as the main throughfare within the City and extends east-west through the City. Pacific Coast Highway is designated by the City's General Plan Mobility Element as a Regional Corridor, which is defined as a street that is designed for intraregional and intercommunity mobility that emphasize traffic movement and include signalized pedestrian crossings. Pacific Coast Highway is also a designated truck route in the City of Long Beach.[2]

East Anaheim Street

East Anaheim Street is designated by the City's General Plan Mobility Element as a Major Avenue, which is defined as street that serves as the major route for the movement of traffic within the City as well as a connector to neighboring cities. A Major Avenue is designed to accommodate four to six travel lanes with a 6-foot parkway within a 100-foot-wide right of way. The portion of East Anaheim Street that abuts the Project Site features four travel lanes and center turning lane to turn onto Clark Avenue and Pacific Coast Highway.

Clark Avenue

Clark Avenue is designated by the City's General Plan Mobility Element as a Minor Avenue, which is defined as a street that provides for the movement of traffic to neighborhood activity centers and serves as a route between neighborhoods. A Minor Avenue is designed to accommodate two to four travel lanes with a 6-foot parkway within an 80-foot-wide right of way. The portion of Clark Avenue that abuts the Project Site features four travel lanes.

Transit Service

Long Beach Transit (LBT) has multiple stops that travel along the Project Site frontages, including Line 41, 45, and 46 which travels west/east along East Anaheim Street. These LBT routes provide service to the Los Angeles County Metropolitan Transportation Authority (Metro) Downtown Long Beach Station 3.57 miles southwest of the Project. Additional LBT stops for Lines 171 and 175 are provided 250 feet east of the Project Site. Various other LBT Lines, including Lines 91, 111, 112, 121, and 173, are located within 0.5 miles of the Project Site.

Pedestrian and Bicycle Facilities

Sidewalks, crosswalks, and vegetated buffers support pedestrian usage in the vicinity of the Project Site. Pedestrian access is provided via sidewalks located along Pacific Coast Highway, East Anaheim Street, and Clark Avenue. Bicycle access is provided by existing Class II bicycle lanes, which are stripes and signed bike lanes, on Pacific Coast Highway. There is also a proposed Class II bicycle lane along Clark Avenue, as outlined in the City's Bicycle Master Plan.[3]

[2] City of Long Beach, City of Long Beach Truck Routes, https://www.longbeach.gov/globalassets/pw/media-library/documents/resources/general/maps-and-gis/truckroutemap_web. Accessed August 20, 2024.
[3] City of Long Beach, Interactive Bike Map, https://www.longbeach.gov/goactivelb/resources/interactive-bike-map/. Accessed August 20, 2024.

Existing Vehicle Trips

The trip generation for the existing use is summarized in **Table 4.12-2: Project Trip Generation** under Impact TRA-1. As shown, the Project Site currently generates 1,188 two-way average daily trips with 167 morning (AM) peak hour trips and 158 evening (PM) peak hour trips.

4.12.3 Impact Analysis

Methodology

Potential impacts on transportation were evaluated by identifying conflicts between the Project and applicable programs, plans, ordinances, or policies addressing the circulation system. Consistency with such policies is determined by reviewing the relevant planning documents applicable to the Project area, including the City's General Plan, and identifying existing, proposed, and approved transit capital improvement projects near the Project Site.

The analysis presented herein is also partly derived from the TGA VMT Memorandum prepared by Kimley-Horn and Associates, Inc. on August 23, 2024. The TGA VMT Memorandum establishes the trip generation of the Project and determines if a VMT and/or Level of Service (LOS) analysis is required for the Project.

Trip generation estimates for the proposed and existing uses on the Project Site were calculated using the Institution of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition trip generation rates for Off-Campus Student Mid-Rise Housing (Land Use Code 226), and General Office Building (Land Use Code 710). The Off-Campus Student Mid-Rise Housing provides trip rates based on being within 0.5 miles of a campus. To account for the Project being over 0.5 miles from any post-secondary campus, modified rates were developed using ITE trip generation data from the Off-Campus Student Apartment (Low-Rise) land use with the "adjacent to campus" subcategory.

The ITE Trip Generation Manual, 11th Edition, defines Off-Campus Student Apartments as complexes that house college students and are typically rented by the bedroom. The apartments typically also contain a common area or shared living space and range in dwelling unit size between a studio and five-bedroom apartment. As a conversative approach, for trip generation purposes, the number of bedrooms equals the proposed number of beds for the Project (593). Daily, AM peak hour, and PM peak hour trip generation estimates for the existing and proposed uses are summarized on **Table 4.12-2** under Impact TRA-1 below.

Thresholds of Significance

The following thresholds of significance are based on the Environmental Checklist contained in Appendix G of the CEQA Guidelines. A project would result in significant adverse impacts related to transportation if the Project would:

- Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
- Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b).
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- Result in inadequate emergency access.

As discussed in the Initial Study, provided in **Appendix A** of this EIR, and in **Section 6.0. Other CEQA Considerations**, the Project would have a less than significant impact regarding consistency with CEQA Guidelines Section 15064.3, subdivision (b); no impact related to hazards due to a geometric design feature or incompatible uses; and a less than significant impact related to emergency access.

Project Impacts

Threshold TRA-1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact TRA-1: Less than Significant Impact.

The Project is an adaptive reuse of an existing seven-story office building into a private dormitory (housing for students) with 149 residential suites that would include 593 beds. Project construction has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Construction activities would likely require lane closures along Clark Avenue and Anaheim Street. Furthermore, as required by the Long Beach Department of Public Works, the applicant would develop a Traffic Management Plan (TMP), stamped and signed by a professional civil or traffic engineer, as part of the Project permit application. The TMP would limit any potential conflicts with transit. During Project operation, the Project may generate increased vehicle, bicycle, pedestrian, and transit trips, resulting in an increase in the use of the Project area's transportation facilities.

The following plans, policies, and ordinances are reviewed below: SCAG 2024 RTP/SCS; General Plan Mobility Element, Bicycle Master Plan, City's Traffic Impact Analysis Guidelines, and LBMC.

SCAG 2024 RTP/SCS

Please refer to **Table 4.9-1** of **Section 4.9, Land Use and Planning**, of this EIR for a consistency analysis of the Project with specific goals and policies of SCAG's 2024 RTP/SCS. As shown in **Table 4.9-1**, the Project would be consistent with the SCAG 2024 RTP/SCS.

City of Long Beach General Plan Mobility Element

Table 4.12-1, Project Consistency with City of Long Beach General Plan Mobility Element, evaluates the Project's consistency with applicable goals and policies from the City's General Plan Mobility Element. As shown in **Table 4.12-1**, the Project would be consistent with the Mobility Element.

Table 4.12-1: Project Consistency with City of Long Beach General Plan Mobility Element

General Plan Goals, Strategies, and Policies	Project Consistency Analysis
Mobility Element (2013)	
Goal No. 1: Create an Efficient, Balanced, Multimodal Mobility Network	**Consistent.** This goal is largely in the City's purview. However, the Project would support infill development of new housing near existing transit existing services and educational facilities. Existing transit services that serve the Project Site include LBT Lines 41, 45, and 46, which provide service to the Metro Downtown Long Beach Station. Additional transit lines also include LBT Lines 171, 175, 91, 111, 112, 121, and 173; which are all within 0.5 miles of the Project Site. All these services would continue to serve the Project Site during Project operations. Pedestrian access to the Project Site is currently provided via sidewalks located along Pacific Coast Highway, East Anaheim Street, and Clark Avenue and will be continued to be provided during Project operations; and bicycle access is provided via bicycle paths on Pacific Coast Highway. Additionally, the Project would provide 150 new bicycle parking spaces that would further promote the use of bicycles.
MOP Policy 1-9: Increase mode shift of transit, pedestrians, and bicycles.	**Consistent.** The Project Site is currently served by transit such as LBT Lines 41, 45, and 46, which provide service to the Metro Downtown Long Beach Station; LBT Lines 171, 175, 91, 111, 112, 121, and 173which are all within 0.5 miles of the Project Site. Pedestrian access to the Project Site is provided via sidewalks located along Pacific Coast Highway, East Anaheim Street, and Clark Avenue; and bicycle access is provided via bicycle paths on Pacific Coast Highway. Additionally, the Project would provide 150 new bicycle parking spaces that would further promote the use of bicycles. The Project would continue to be served by all transit, pedestrian, and bicycle facilities.
MOP Policy 1-13: Increase multimodal access to major employers and educational institutions, including Long Beach Community.	**Consistent.** As mentioned above, the Project Site is currently served by various existing pedestrian, bicycle, and transit facilities in proximity to the Project Site and would continue to be served by such facilities during Project operations. Particularly, the Project Site is in proximity to

	multiple stops for several LBT Lines that would continue to provide service to major employers including the surrounding commercial and office uses in the vicinity of the Project Site. Additionally, several LBT Lines would provide service to nearby educational institutions, such as CSULB 1.5 miles east of the Project Site, and Long Beach City College, with its nearest campus located approximately 2.2 miles northwest of the Project Site.
MOP Policy 2-15: Ensure that all new development is consistent with the applicable provisions of the Bicycle Master Plan.	**Consistent.** The Project would be consistent with all applicable provisions of the Bicycle Master Plan.
MOP Policy 2-17: Ensure safe, convenient, and adequate, on- and off-street bicycle parking facilities to accommodate and encourage residents to cycle for commuting and daily needs.	**Consistent.** The Project would provide 150 new bicycle parking spaces on the first level of the subterranean parking structure on-site, which would accommodate and encourage student residents to cycle for commuting and daily needs.
Strategy No. 5: Reduce the environmental impacts of the transportation system.	**Consistent.** The Project would provide EV parking. Particularly, 10 percent of the total number of parking spaces would be EV charging spaces capable of supporting future Level 2 EV supply equipment (EVSE), 25 percent of the total number of parking spaces would be EV ready, and 5 percent of the total number of parking spaces would be equipped with EVCS.
MOP Policy 5-6: Support the development of a network of public and private alternative fuel vehicle charging/ fueling stations Citywide.	
	Consistent. Pedestrian access to the Project Site is provided via sidewalks located along Pacific Coast Highway, East Anaheim Street, and Clark Avenue; and bicycle access is provided via bicycle paths on Pacific Coast Highway. Additionally, the Project is also in proximity to several transit facilities and lines, such as LBT Lines 41, 45, and 46, which provide service to the Metro Downtown Long Beach Station; LBT Lines 171, 175, 91, 111, 112, 121, and 173 which are all within 0.5 miles of the Project Site. The Project would not continue to be served by all these transit, pedestrian, and bicycle facilities. Per LBMC Chapter 21.41, special residential uses, such as dormitory uses, would require one parking space per bed. However, the Project Site is located within 0.5 miles of public transit. As such, the Project would be subject to AB 2097, which prohibits public agencies or cities from imposing a minimum automobile parking requirement on most development projects located within a 0.5-mile
MOP Policy 6-11: Encourage the use of transit, carpooling, and walking to reduce the need for parking.	
MOP Policy 6-12: Promote transit-oriented development with reduced parking requirements around appropriate transit hubs and stations to facilitate the use of available transit services.	
MOP Policy 6-13: Consider reducing parking requirements for mixed-use developments, for developments providing shared parking or a comprehensive Transportation Demand Management (TDM) Program, or developments located near major transit hubs.	

	radius of a major transit stop. The Project would provide 0.61 spaces per bed, which would result in 364 proposed vehicle parking stalls. The Project would continue to encourage the use of walking, cycling, and transit by maintaining existing pedestrian, bicycle, and transit access to the Project Site. The Project would also provide 150 new parking spaces and a rideshare drop-off and drop-off area, which would further encourage the use of cycling and carpooling.

Source: City of Long Beach, General Plan Mobility Element, October 2013, https://www.longbeach.gov/globalassets/lbcd/media-library/documents/orphans/mobility-element/320615_lbds_mobility_element_web. Accessed August 23, 2024.

Bicycle Master Plan

There is an existing bicycle path located along Pacific Coast Highway. The final phase build out of the Bicycle Master Plan Complete Vision network would include a bikeway on East Anaheim Street, located adjacent to the Project Site. As mentioned above, the planning horizon for the Bicycle Plan is 2040. The Project has an estimated completion date of 2026. Therefore, implementation of the Project would not conflict with the Bicycle Master Plan.

Long Beach Traffic Impact Analysis Guidelines

The City of Long Beach Traffic Impact Analysis Guidelines states that a traffic impact study is generally required "for any project in Long Beach that is expected to generate 500 or more net new daily trips." Based on the City's traffic study guidelines, a traffic study would be needed if the project generates more than 500 net daily trips. However, as shown in **Table 4.12-2**, the Project would generate less than 50 total net new peak hour trips (the City's threshold to analyze LOS at intersections). Therefore, a traffic impact study is not required for the Project.

Table 4.12-2: Project Trip Generation

Land Use	Size	Unit	ADT[1]	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Proposed Land Use									
Off-Campus Student Apartment (Mid-Rise) (Modified Rates for Over ½ Mile from Campus)	593	bedrooms	1,695	25	30	55	76	85	161
Existing Land Use									
General Office Building	109.6	ksf	-1,188	-147	-20	-167	-27	-131	-158
Net Project Trips			***507***	***-122***	***10***	***-112***	***49***	***-46***	***3***

ksf = thousand square feet
Source: Kimley-Horn and Associates, TGA VMT Memorandum, 2024.

City of Long Beach Municipal Code

LBMC Chapter 21.41 requires that special residential uses, including dormitory uses, would require one parking space per bed. However, the Project Site is in proximity to several transit

facilities and lines, such as LBT Lines 41, 45, and 46, which provide service to the Metro Downtown Long Beach Station; LBT Lines 171, 175, 91, 111, 112, 121, and 173. . As the Project Site is located within 0.5 miles of public transit, the Project would be subject to AB 2097, which prohibits public agencies or cities from imposing a minimum automobile parking requirement on most development projects located within a 0.5-mile radius of a major transit stop. The Project would provide 0.61 spaces per bed, which would result in 364 proposed vehicle parking stalls. As the Project is exempt from providing a minimum number of parking spaces under AB 2097, LBMC Chapter 21.41 is inapplicable to the Project.

The Project would provide one bicycle parking space for each suite, for a total of 149 spaces. The Project would provide 150 new bicycle parking spaces on the first level of subterranean parking, which would exceed the City's required number of parking spaces. Therefore, the Project would comply with the City's bicycle parking requirements.

Based on the above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

Cumulative Impacts

Section 3.3, Cumulative Development*,* identifies no related projects within an approximately 1-mile radius of the Project Site that are planned, under construction, or have been recently completed.

As described in Impact TRA-1, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Project Site would be served by existing transit systems and would not conflict with existing transit, as required per the Traffic Management Plan (TMP). Development within the Project area would be required to comply with all applicable program, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Project impacts would be less than significant. As stated earlier, no related projects are within an approximately 1-mile radius of the Project Site. Therefore, the Project would result in less than significant impacts to transportation.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Project-specific and cumulative impacts related to transportation would be less than significant.

4.13 Tribal Cultural Resources

This section of the EIR discusses potential impacts to tribal cultural resources associated with the Project. Impacts are evaluated based on the Project's potential to result in substantial adverse change in the significance of a tribal cultural resource (TCR) as defined in Public Resources Code (PRC) Section 21074. PRC Section 21074(a) states:

> (a) "Tribal cultural resources" are either of the following:
>
> > (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following
> >
> > > (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
> > >
> > > (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
> >
> > (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
>
> (b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
>
> (c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

4.13.1 Regulatory Setting

State

California Register of Historical Resources (Public Resource Code Section 5024.1 *et seq.*)

State law protects cultural resources by requiring evaluations of the significance of historical resources in CEQA documents. A cultural resource is an important historical resource if it meets any of the criteria found in section 15064.5(a) of the State CEQA Guidelines. The California Register of Historic Resources (CRHR) is maintained by the state Office of Historic Preservations. The following resources are automatically included in the CRHR: properties listed, or formally designated eligible for listing, on the National Register of Historic Places; state historical landmarks; and points of interest recommended for listing in the CRHR by the State Historical Resources Commission (SHPO). Additionally, resources included in a local register of historical resources or deemed significant are presumed to be historically or culturally significant for purposes of CEQA.

For purposes of CEQA, a historical resource is any object, building, structure, site, area, place, record, or manuscript listed in or eligible for listing in the CRHR (Public Resources Code [PRC] section 21084.1). A resource is eligible for listing in the CRHR if it meets any of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

The California Code of Regulations (CCR) further provides that cultural resources of local significance are CRHR-eligible (Title 14 CCR, section 4852).

Assembly Bill 52 (Public Resources Code Section 21080.3.1)

The Native American Historic Resource Protection Act (AB 52) took effect July 1, 2015 and incorporates tribal consultation and analysis of impacts to TCRs into the CEQA process. It requires TCRs to be analyzed similar to other CEQA topics and establishes a consultation process for lead agencies and California Tribes. Projects that require a Notice of Preparation of an EIR or Notice of Intent to adopt a ND or MND are subject to AB 52. A significant impact on a TCR is considered a significant environmental impact, requiring adoption and implementation of feasible mitigation measures.

As described above, TCRs are defined in one of two ways. Either the TCR qualifies as a historical resource according to PRC § 5024.1, or the TCR is defined by the lead agency, as long as the lead agency supports its determination with substantial evidence and considers the resource's significance to a California Tribe. PRC § 21080.3.1(b) establishes the process for engaging in consultation with California Native American Tribes. The following describes the process for consultation:

(b) Prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the lead agency shall begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if:

(1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and

(2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation. When responding to the lead agency, the California Native American tribe shall designate a lead contact person. If the California Native American tribe does not designate a lead contact person, or designates multiple lead contact people, the lead agency shall defer to the individual listed on the contact list maintained by the Native American Heritage Commission for the purposes of Chapter 905 of the Statutes of 2004. For purposes of this section and Section 21080.3.2, "consultation" shall have the same meaning as provided in Section 65352.4 of the Government Code.

(c) To expedite the requirements of this section, the Native American Heritage Commission shall assist the lead agency in identifying the California Native American tribes that are traditionally and culturally affiliated with the project area.

(d) Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

(e) The lead agency shall begin the consultation process within 30 days of receiving a California Native American tribe's request for consultation.

California Health and Safety Code (Section 7050.5)

The State of California regulates the accidental discovery of human remains. Section 7050.5 of the Health and Safety Code states:

In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation…until the coroner…has determined…that the remains are not subject to…provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible. The coroner shall make his or her determination with two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and…has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

Local

City of Long Beach General Plan

The Long Beach General Plan (General Plan) includes goals, policies, and directions to achieve the City's vision of the community and future development.[1] The General Plan includes 11 elements that have been updated at various points between 1966 and 2023. The elements focus on: Air Quality, Conservation, Historic Preservation, Housing, Land Use, Mobility, Noise, Open Space and Recreation, Public Safety, Seismic Safety, and Urban Design.

The General Plan established the following policies relevant to TCRs within the City that are applicable to the Project:

Historic Preservation Element

- **Goal 1:** Maintain and support a comprehensive, citywide historic preservation program to identify and protect Long Beach's historic, cultural, and archaeological resources.

[1] City of Long Beach, Long Beach General Plan. https://www.longbeach.gov/lbds/planning/advance/general-plan/ Accessed November 6, 2024.

  - **Policy P.1.1:** The City shall comply with City, State, and Federal historic preservation regulations to ensure adequate protection of the City's cultural, historical, and archaeological resources.

- **Goal 2:** Protect historic resources from demolition and inappropriate alterations through the use of the City's regulatory framework, technical assistance, and incentives.
  - **Policy P.2.1:** The City shall discourage the demolition and inappropriate alteration of historic buildings.
  - **Policy P.2.4:** The City shall ensure compliance of all historic preservation, redevelopment, and new construction projects with the California Environmental Quality Act (CEQA), and Section 106 of the National Historic Preservation Act.
  - **Policy P.2.5:** The City shall enforce historic preservation codes and regulations.

Land Use Element:

- **LU Policy 20-12:** Ensure minimization of potential development impacts in accordance with policies for protection of natural resources in the Natural Resource Protection Policies section in the Appendix:

Natural Resource Protection Policies, Cultural Resources:

1. Minimize any potential impacts to unknown archaeological resources by ensuring appropriate treatment and documentation of the discovery in accordance with federal, State, and local guidelines, including those set forth in California PRC Section 21083.2.
2. Minimize any potential impacts to unknown paleontological resources by ensuring appropriate treatment and documentation of the discovery in accordance with federal, State, and local guidelines.
3. Minimize any potential impacts to unknown buried human remains by ensuring appropriate examination, treatment, and protection of human remains (in the event of an unanticipated discovery of a burial, human bone, or suspected human bone) as required by California Code of Regulations (CCR) Section 15064.5(e), PRC Section 5097, and Section 7050.5 of the State's Health and Safety Code, or as updated.

4.13.2 Environmental Setting

As described in **Chapter 2, Project Description**, the Project Site is located in an urbanized portion of the eastern part of Long Beach. The approximately 1.2-acre Project Site is currently developed with seven-story office building and three levels of subterranean parking, and a surface parking lot, driveway, and landscaping. The majority of the Project Site is paved with either, asphalt or concrete.

The City of Long Beach has established 18 historic landmark and historic districts, or contiguous groups of properties that retain historical integrity.[2] While each building within a district may not be individually qualified for landmark or historic status, they collectively establish a historic character of the area. Based on the City of Long Beach Designated Historic Districts map, the Project Site is not within one of the 18 historic districts. The Project Site is not listed on the CRHR

[2] City of Long Beach. General Plan Historic Preservation Element, 2010, page 48, https://www.longbeach.gov/globalassets/lbcd/media-library/documents/planning/advance/general-plan/final-long-beach-historic-preservation-element_6-22-2010. Accessed August 1, 2024.

list containing properties listed, or formally designated as eligible for listing on the National Register of Historic Places, state historical landmarks, and points of interest.[3] Additionally, the Project Site is not designated by the City as a historical landmark.[4]

4.13.3 Impact Analysis

Methodology

Per the requirements of AB 52, public agencies must consult with California Native American tribes during the CEQA process in order to identify potential impacts to TCRs. The process for consultation follows this process:

- A California Native American Tribe asks agencies in the geographic area with which it is traditionally and culturally affiliated to be notified about projects. Tribes must ask in writing for consultation.
- Within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all Tribes who have requested it.
- A Tribe must respond within 30 days of receiving the notification if it wishes to engage in consultation.
- The lead agency must initiate consultation within 30 days of receiving the request from the Tribe.
- Consultation concludes when both parties have agreed on measures to mitigate or avoid a significant effect to a TCR, or a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached.
- Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on TCRs and discuss feasible alternatives or mitigation that avoid or lessen the impact.

For purposes of identifying potential sacred lands or traditional cultural properties within or near the Project Site, the City contacted the Native American heritage Commission (NAHC) to conduct a search of the Sacred Lands File (SLF) (see **Section 4.3, Cultural Resources**). The NAHC provided the City with a list of California Native American Tribes known to have knowledge of the area in which the Project is located.

On August 6, 2024, the City initiated consultation pursuant to AB 52 with representatives of the California Native American Tribes identified by the NAHC. Tribes contacted included those within the jurisdiction of the City as well as those traditionally and culturally affiliated to the geographic area where a project is located.

Thresholds of Significance

An impact is considered significant if the Project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and

[3] Office of Historic Preservation, California Historical Resources, https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=19. Accessed October 30, 2024.
[4] City of Long Beach, General Plan Historic Preservation Element, pages 41 through 46.

scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Project Impacts

Threshold TCR-1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Impacts TCR-1: No Impact

The Project Site is currently fully developed with a seven-story office building with three levels of subterranean parking. The existing structures were constructed in 1981 and has been primarily used as office space. As discussed in **Appendix C**, **Cultural Resources Assessment**, the existing buildings on the Project Site have been determined to not be eligible for listing in either the CRHR, or in a in a local register of historical resources. Therefore, the Project does not contain any resources that are likely to have historic significance. The Project would have no impact to historical resources.

Threshold TCR-2: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Impacts TCR-2: Less than Significant Impact with Mitigation

A search of the SLF was conducted through the NAHC to determine if any sacred lands or traditional cultural properties on file with the NAHC were within or near the Project Site. The

NAHC's SLF record search was positive, indicating that there is record of sacred lands on the Project Site.[5]

In compliance with AB 52 the City provided formal notification to California Native American tribal representatives identified by the NAHC. Native American groups may have knowledge about the area's cultural resources and may have concerns about a development's adverse effects on tribal cultural resources.[6] AB 52 allows Tribes 30 days after receiving notification to request consultation. On August 6, 2024, the City contacted representatives of the following tribes:

- Gabrieleño Band of Mission Indians – Kizh Nation
- Gabrieleño/Tongva San Gabriel Band of Mission Indians
- Gabrieleño/Tongva Nation
- Gabrieliño Tongva Indians of California Tribal Council
- Gabrieliño - Tongva Tribe
- Juaneño Band of Mission Indians Acjachemen Nation - Belardes
- Juaneño Band of Mission Indians Acjachemen Nation – 84A
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseno Indians

The City received one request for consultation from the Gabrieleño Band of Mission Indians – Kizh Nation. During consultation, the Gabrieleño Band of Mission Indians – Kizh Nation provided written responses over potential impacts to tribal cultural resources in lieu of an in-person consultation meeting. The other tribes listed above did not respond to the request for consultation and have opted out of the AB 52 consultation process. Therefore, the City has completed tribal consultation as provided for by AB 52. Correspondence to tribal representatives is included in **Appendix I**.

With the implementation of **Mitigation Measure TCR-1, Retain a Native American Monitor Prior to Commencement of Ground Disturbing Activities,** the Project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. Implementation of **Mitigation Measure TCR-1**, requiring a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation, would reduce potential impacts to tribal cultural resources to less than significant.

Cumulative Impacts

Section 3.3, Cumulative Development identifies no related projects within an approximately 1-mile radius of the Project Site that are planned, under construction, or have been recently

[5] Native American Heritage Commission. March 26, 2024. Native American Heritage Commission Letter and Native American Tribal Consultation List.
[6] California Public Resources Code (PRC) Section 21074.

completed. As discussed under Impact TCR-1 there were no historical resources on the Project Site identified. Furthermore, as discussed under TCR-2, the Project would implement Mitigation Measure TCR-1 and retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation prior to the commencement of any "ground disturbing activity". This would reduce any impacts to less than significant. Likewise, any Projects in the City of Long Beach would be required to comply with federal, State, and local regulations pertaining to these resources. As there are no cumulative projects identified within an approximately 1-mile radius of the Project Site, cumulative impacts related to tribal cultural resources are less than significant.

Mitigation Measures

Mitigation Measure TCR-1, Retain a Native American Monitor Prior to Commencement of Ground Disturbing Activities: The Project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

Level of Significance After Mitigation

Project-specific and cumulative impacts related to tribal cultural resources would be less than significant with implementation of **MM TCR-1**.

4.14 Utilities and Service Systems

This Section of the EIR examines the public utilities and service systems that would be used by the Project and describes potential impacts due to the implementation of the Project. The evaluation of utilities and services is based on the Hydrology Study and Utility Memorandum, both of which were prepared by Kimley-Horn and Associates, Inc. on July 23, 2024, which are contained in **Appendix F, Hydrology Study,** and **Appendix J, Utility Memorandum,** respectively.

4.14.1 Regulatory Setting

Federal

Clean Water Act

The Clean Water Act (CWA)(33 U.S.C. §§ 1251 *et seq*.) was enacted to control the discharge of pollutants into the waters of the United States. The CWA charges the U.S. Environmental Protection Agency (U.S.EPA) to set wastewater standards and manage the National Pollutant Discharge Elimination System (NPDES) permit program. Under the NPDES program, permits are required for all new development that discharges directly into the waters of the United States. The CWA also requires wastewater treatment of all effluent before it is discharged into surface waters. NPDES permits for the Project Site would be issued by the Los Angeles Water Quality Control Board (RWQCB).

Federal Safe Drinking Water Act

The Safe Drinking Water Act (SDWA)(Pub. L. 93-523) is intended to protect public health by regulating the nation's public drinking water supply. The SDWA authorizes the U.S.EPA to set national standards for drinking water to protect against both naturally occurring and man-made contaminants.

State

California Green Building Standards Code

California Green Building Standards Code (CALGreen) (Cal. Code Regs. Tit. 24, part 11) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went into effect on August 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective on January 1, 2023.

California Safe Drinking Water Act

The State's Safe Drinking Water Act (Health & Saf. Code §§ 116270-116755), charges the California Department of Health Services (DHS) primary enforcement responsibility for the State's drinking water supply. Title 22 of the California Code of Regulations (CCR) (Division 4, Chapter 15, "Domestic Water Quality and Monitoring Regulations") established DHS authority and provides drinking water quality and monitoring requirements, which are equal to or more stringent than federal standards.

California Recycled Water Regulations

The regulation of recycled water is vested by State law in the State Water Resources Control Board (SWRCB) and the California Department of Public Health Services (DPH). DPH is responsible for regulating the use of recycled water. Title 17 (California Water Code, §§ 13500–13556) regulates the protection of the potable water supply through the control of cross-connections with potential contaminants, including recycled water. The established water quality standards and treatment reliability criteria for recycled water are codified in Title 22 of the California Water Code. The requirements of Title 22, as revised in 1978, 1990, and 2001, establish the quality and/or treatment processes required for a recycled effluent to be used for a non-potable application. In addition to recycled water uses and treatment requirements, Title 22 addresses sampling and analysis requirements at the treatment plant, preparation of an engineering report prior to production or use of recycled water, general treatment design requirements, reliability requirements, and alternative methods of treatment.

Urban Water Management Planning Act

The Urban Water Management Planning Act (UWMP) (California Water Code, Division 6, Part 2.6, § 10610 *et seq*.) was enacted in 1983. The UWMP Act applies to municipal water suppliers that serve more than 3,000 customers or provide more than 3,000 acre-feet per year (AFY) of water. The UWMP Act requires these suppliers to update their Urban Water Management Plan (UWMP) every five years to demonstrate an appropriate level of reliability in supplying anticipated short-term and long-term water demands during normal, dry, and multiple dry years.

Assembly Bill 1668 and Senate Bill 606 – May 31, 2018

AB 1668 and SB 606 establish guidelines for efficient water use and a framework for the implementation and oversight of water standards that were to be in effect in 2022. The two bills strengthen the State's water resiliency in the face of future droughts with provisions that include:

- Establishing water use objectives and long-term standards for efficient water use that apply to urban retail water suppliers; comprised of indoor residential water use, outdoor residential water use, commercial, industrial and institutional (CII) irrigation with dedicated meters, water loss, and other unique local uses.
- Providing incentives for water suppliers to recycle water.
- Identifying small water suppliers and rural communities that may be at risk of drought and water shortage vulnerability and provide recommendations for drought planning.
- Requiring both urban and agricultural water suppliers to set annual water budgets and prepare for drought.

Senate Bill 610

SB 610 requires water assessments be furnished to local governments for inclusion in any environmental documentation for certain projects (as defined in Water Code 10912 [a]) subject to the CEQA.[1]

[1] California Department of Water Resources (CDWR), Guidebook for Implementation of Senate Bill 1610 and Senate Bill 221 of 2001 to assist water suppliers, cities, and counties in integrating water and land use planning; October 2003, https://digitalcommons.law.ggu.edu/cgi/viewcontent.cgi?article=1094&context=caldocs_agencies. Accessed June 11, 2024.

California Integrated Waste Management Act

The California Integrated Waste Management Act (Assembly Bill [AB] 939) was enacted in 1989 to reduce solid waste generated in California to the maximum extent feasible. AB 939 required counties, cities, and regional solid waste management agencies to develop plans and implement programs to divert 25 percent of their solid waste from landfills by 1995 and 50 percent by 2000. Diversion is expected to be achieved through source reduction, recycling, and composting, and requires the participation of public agencies, as well as residential, commercial, and industrial users. Since 2000, subsequent legislation mandated that the 50 percent reduction goal be met annually.

AB 939 requires all California counties and cities to prepare solid waste management programs that include Source Reduction and Recycling Elements. Each jurisdiction is required to produce annual reports documenting steps taken to meet the requirements of AB 939.

California Solid Waste Reuse and Recycling Access Act

The California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327) required California Department of Resources Recycling and Recovery (CalRecycle) to prepare a model ordinance addressing storage of recyclable materials for development projects. The model ordinance was intended to be adoption by California counties and cities to help them meet the requirements of AB 939. Under AB 1327, applications for building permits for development projects must include adequate and accessible areas for the collection and loading of recyclable materials.

Local

Long Beach Municipal Code

Long Beach Municipal Code (LBMC) Chapter 8.60, *Solid Waste, Recycling and Litter Prevention and Mandatory Organic Waste Disposal Reduction*. of the addresses solid waste, recycling, and litter prevention. Sections 8.60.025 and 8.60.020 include standards regarding refuse and recycling receptacles for removing and conveying waste. LBMC Section 8.60.080 addresses waste requiring special handling (e.g., material likely to become airborne) and permitting refuse transportation.

Title 15, *Public Utilities*, of the LBMC includes seven chapters regulating wastewater line connections and the development of new wastewater facilities. LBMC Chapter 15.01, *Sewers – Rules, Regulations, and Charges,* establishes that the current edition of the rules, regulations, and charges governing water and sewer service as approved by the Board of Water Commissioners is incorporated by this reference. Chapter 15.08, *Sewers – Permits*, specifies that only employees of the water department are allowed to construct or alter a public sewer, a sewage pumping plant, a private sewer in a public street, or a house connection or make a connection from a building sewer to a house connection unless a permit from the general manager has been provided. Chapter 15.20, *Sewers – Use Regulations*, prohibits the discharge of various items into any public sewer in the City.

LBMC Chapter 18.67, *Construction and Demolition Recycling Program*, provides regulations for the City's construction and demolition (C&D) recycling program. Section 18.67.020 requires all projects requiring a demolition permit and all projects requiring a construction permit on or after January 1, 2017, divert at least 65 percent of all C&D materials to recycling. Applicants for demolition and construction permits must also prepare waste management plans. The C&D

program also aims to encourage permit applicants to recycle all materials when feasible, through a refundable performance deposit. Additionally, the C&D program encourages the use of green building techniques in new construction and promotes reuse or salvaging materials in construction and demolition projects.

LBMC Chapter 21.42, *Landscaping Standards*, provides the minimum requirements for the provision and maintenance of landscaped areas.

Long Beach Utilities Department 2020 Urban Water Management Plan

The 2020 Urban Water Management Plan (2020 UWMP), published by the Long Beach Utilities Department (formerly known as Long Beach Water Department), provides a plan for managing the City's water resources consistent with the Long Beach Utilities Department's goals and policy objectives. The UWMP meet's the City's obligations under the California's Urban Water Management Planning Act. The 2020 UWMP provides a 30-year forecast of water demand in its service area (2020 through 2050), in five-year increments.

Long Beach Utilities Water Shortage Contingency Plan

The LBUD adopted a Water Shortage Contingency Plan on June 22, 2023, to help prevent water shortages through aggressive and effective management programs. Starting August 1, 2023, Long Beach Utilities Water Shortage Contingency Plan Level 1 is in effect, which provides water restrictions for residential and commercial uses. For instance, the irrigation of non-functional turf (grass) in commercial, industrial, and institutional settings is prohibited; and a single-pass cooling system cannot be installed in a building requesting a water connection after November 3, 2006.[2] The Rules, Regulations and Charges Governing Potable Water, Reclaimed Water, Sewer Service, and the Water Shortage Contingency Plan also became effective August 1, 2023, which governs potable water, reclaimed water, sewer service, and the Water Shortage Contingency Plan.

Los Angeles Countywide Integrated Waste Management Plan

The Los Angeles County Department of Public Works (LADPW) prepared the Countywide Integrated Waste Management Plan (ColWMP), including the Countywide Siting Element. The CoIWMP was prepared by Los Angeles County to describe the steps necessary for individual jurisdictions to achieve the 50-percent waste diversion mandate of AB 939.

The Countywide Siting Element was adopted in 1998 and has a 15-year planning horizon. The Siting Element identifies how Los Angeles County, and its cities would meet their long-term disposal capacity needs.

4.14.2 Environmental Setting

The following sections describe existing utility services for the Project Site. Utilities described include water supply, solid waste, wastewater, electricity and natural gas, and telecommunications.

Water Supply

Water service for the Project Site are provided by the City of Long Beach Utilities Department (LBUD). The LBUD serves nearly 500,000 customers in an approximately 50 square mile service

[2] LBUD, Water Shortage Contingency Plan, 2023, https://www.lbutilities.org/files/sharedassets/utilities/v/1/save-water/documents/wscp-reso-ut-1480-003.pdf. Accessed August 19, 2024.

area comprised of residential, commercial, and industrial uses, including the Project Site. The potable water system consisting of approximately 910 miles of transmission and distribution pipeline and over 93,000 service connections.[3]

LBUD primarily relies on groundwater extracted locally from the Central Basin to meet customer water demands. The rest of the water is imported water and is purchased wholesale from the Metropolitan Water District of Southern California (MWD). LBUD also provides recycled water to its customers. **Table 4.14-1: Existing and Future Water Supplies** shows current and planned water supplies for the city.

Table 4.14-1: Existing and Future Water Supplies

Source	Water Supply (AFY)						
	2020	2025	2030	2035	2040	2045	2050
Groundwater – Central Basin	21,932	37,216	37,216	41,126	41,126	41,126	41,126
Groundwater – West Coast Basin	0	3,226	3,226	3,226	3,226	3,226	3,226
Imported	29,472	30,900	30,900	30,900	30,900	30,900	30,900
Recycled	10,685	13,500	13,500	13,500	13,500	13,500	13,500
Total	**62,089**	**84,752**	**84,752**	**88,752**	**88,752**	**88,752**	**88,752**

Source: LBUD, 2020 Urban Water Management Plan, 2020, page 59, https://www.lbutilities.org/files/sharedassets/utilities/v/1/about-us/documents/lbwd_uwmp2020_final_errata_revised.pdf. Accessed June 11, 2024.

The 2020 UWMP LBUD projects that water supplies will be sufficient to meet all demands through the year 2050 during normal, single dry year, and multiple dry year hydrologic conditions. **Table 4.14-2: Normal, Single Dry, and Multiple Dry Year Supply and Demand (AFY)** compares projections of LBUD water supply and demand under normal, single dry, and multiple dry years.

Table 4.14-2: Normal, Single Dry, and Multiple Dry Year Supply and Demand (AFY)

Forecasted Year	2025	2030	2035	2040	2045	2050
Normal Year						
Supply	84,752	84,752	88,752	88,752	88,752	88,752
Demand	53,964	53,964	51,861	51,691	51,653	52,270
Surplus	30,788	30,788	36,891	37,061	37,099	36,182
Single Dry						
Supply	84,752	84,752	88,752	88,752	88,752	88,752
Demand	53,964	53,964	51,861	51,691	51,653	52,270
Surplus	30,788	30,788	36,891	37,061	37,099	36,182
Multiple Dry						
Supply	84,752	84,752	88,752	88,752	88,752	88,752
Demand	53,964	53,964	51,861	51,691	51,653	52,570
Surplus	30,788	30,788	36,891	37,061	37,099	36,182

AFY= Acre feet per year
Source: LBUD, 2020 Urban Water Management Plan, page 67.

Existing water infrastructure in the vicinity of the Project Site includes the following:

- **Pacific Coast Highway**: There is an existing 30-inch stress corrosion cracking (SCC) water line located 29.5 feet south of the Pacific Coast Highway centerline. There is also an existing 12-inch ductile iron (DI) water line located 21 feet north Pacific Coast Highway centerline the northbound lanes. This existing 12-inch water line serves the Project Site

[3] City of Long Beach Utilities Department, Capital Improvement Program Fiscal Year 2023, 2022, page 2, https://www.lbutilities.org/files/sharedassets/utilities/v/1/about-us/documents/23_cip-final.pdf. Accessed June 11, 2024.

through a 4-inch asbestos cement (AC) water lateral on the northeastern portion of the Project Site.

- **East Anaheim Street**: There is an existing 12-inch AC water line located 46 feet south of the East Anaheim Street centerline. This existing 12-inch water line serves the Project Site through a 6-inch AC and 2-inch polybutylene (PL) water lateral on the southern portion of the Project Site. There is also an 8-inch asbestos cement kabode (AC-KA) water line on East Anaheim Street, south of the Project Site.
- **Clark Avenue**: There is a 21-inch SCC water line along Clark Avenue, 15 feet east of the centerline under the northbound lanes.

Additionally, there are two fire hydrants within the Project Site, with one fire hydrant on the southern side of the Project Site along East Anaheim Street and the other along the northeastern side of the Project Site along Pacific Coast Highway. The Project Site is also served by two existing water meters, with one meter on the south side of the Project Site along East Anaheim Street and the other meter located on the northeastern side of the Project Site along Pacific Coast Highway.

Wastewater

Wastewater services are provided by LBUD, which maintains the City's sewer system and wastewater treatment facilities. The Project would be located within the service area of the A.K Warren Water Resource Facility, formerly known as the Joint Water Control Plant (JWCP), located in the City of Carson at 24501 South Figueroa Street. The A.K. Warren Water Resource Facility provides both primary and secondary treatment of a capacity of 400 million gallons of wastewater each day and serves approximately 4.8 million, residents, businesses, and industries.[4] The facility is owned by Los Angeles County Sanitation Districts (LACSD).

The Project Site is currently served by an 8-inch corrugated polyethylene (CP) sewer line along East Anaheim Street with four sewer laterals that serve the Project Site. There is also an existing 15-inch vitrified clay pipe (VCP) private sewer line located to the north along Pacific Coast Highway.

Stormwater Drainage

As discussed in **Section 4.8, Hydrology and Water Quality**, the Project Site is approximately 33 percent pervious and is assumed to be broken up into six main drainage areas (DA's). Stormwater runoff from the Project Site is directed to the public storm drain system along Pacific Coast Highway, East Anaheim Street, and Clark Avenue.

Solid Waste

The City of Long Beach Environmental Services Bureau is responsible for managing solid waste disposal and recycling in the City. The City contracts with Waste Management for recycling collection services. In the City, solid waste, excluding recyclables, is diverted to one of the County's several landfills or to the Southeast Resource Recovery Facility (SERRF) to be incinerated and used in the production of energy.

[4] Los Angeles County Sanitation Districts, A.K. Warren Water Resource Facility, https://www.lacsd.org/services/wastewater-sewage/facilities/ak-warren-water-resource-facility. Accessed June 11, 2024.

Electricity and Natural Gas

Electricity and natural gas services are provided by Southern California Edison (SCE), Long Beach Energy Resources (LBER), and SoCalGas.

Telecommunications

Telecommunications and internet service within the City are provided by a variety of telecommunications services, including AT&T, Spectrum, Frontier, Verizon, and New Cingular Wireless Services, Inc.[5] In addition, the City owns approximately 60 miles of fiber optic cable in the City.[6]

4.14.4 Impact Analysis

Methodology

The Utility Memorandum prepared by Kimley-Horn and Associates, Inc. on July 23, 2024 (**Appendix J**) assesses water and wastewater demand for the Project. This analysis is based on the Project's forecasted utility usage as compared to the existing capacity of utility facilities that serve the Project Site. Existing water and wastewater utility usage is based on wastewater generation rates as provided by LACSD. Analysis of the Project's impacts relative to water supply is informed through the LBUD 2020 UWMP. The 2020 UWMP summarizes future water demand over a 30-year period, the availability of future water supplies, and water demands. Anticipated solid waste generation is based on generation rates as provided by CalRecycle. Existing water, wastewater, and solid waste usage was conservatively assumed to be based on the portion of the existing building that is currently leased as of January 2024 (109,600 square feet) rather than the square footage of the entire building.

Thresholds of Significance

The following significance criteria for water systems is from the Environmental Checklist in State CEQA Guidelines Appendix G. An impact would be considered significant and would require mitigation if it would meet one of the following criteria:

- Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
- Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;
- Result in a determination by the wastewater treatment provider which services of may serve the project that is has adequate capacity to serve the project's projected demand in addition to the provider's existing commitment; or

[5] Federal Communications Commission, FCC National Broadband Map, https://broadbandmap.fcc.gov/location-summary/mobile?version=dec2022&location_id=bff41fe6-d3de-40da-9208-37f88b341778&addr1=4791+E+MALTA+ST&addr2=LONG+BEACH%2C+CA+90815&zoom=17.21&vlon=-118.133514&vlat=33.783000&env=0&tech=tech4g. Accessed August 22, 2024.
[6] City of Long Beach, Update on Citywide Fiber Network Infrastructure Initiative, 2021, page 2, https://www.longbeach.gov/globalassets/city-manager/media-library/documents/memos-to-the-mayor-tabbed-file-list-folders/2021/martch-4--2021--update-on-citywide-fiber-network-infrastructure-initiative. Accessed August 22, 2024.

- Generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure.
- Comply with federal, State, and local management and reduction statutes and regulations related to solid waste.

Project Impacts

Threshold UTI-1: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Impact UTI-1: Less Than Significant Impact.

Water

As mentioned above, water service for the Project Site is currently provided by LBUD and would also serve the Project.

During Project construction, water would be required for dust control and equipment cleaning. In addition, the contractor would install portable restrooms and hand washing stations. It is anticipated that construction activity and temporary portable restroom and hand washing facilities would use imported water. Project construction would not require connections to the City's water infrastructure.

Water demand for the Project during Project operations was estimated based on LACSD sewer generation factors multiplied by a 120 percent factor. As shown in **Table 4.14-3: Estimated Project Water Consumption**, compared to existing uses, Project operations would increase water demand by approximately 7,500 gpd, with a peak consumption of 18,750 gallons per day (gpd).

Table 4.14-3: Estimated Project Water Consumption

Land Use	Size	Water Consumption Rate[1]	Water Consumption Flow (gpd)[2]
Existing Land Use			
Office Building	109.6 ksf[3]	240 gpd/ksf	26,304 gpd
Total Existing Average Water Consumption			*26,304 gpd*
Total Existing Peak Water Consumption[4]			*65,760 gpd*
Proposed Land Use			
Manager Office	0.451 ksf	240 gpd/ksf	108.2 gpd
Gym/Fitness	2.147 ksf	720 gpd/ksf	1,546 gpd
Club	0.993 ksf	150 gpd/ksf	149 gpd
Laundry	0.895 ksf	4,590 gpd/ksf	4,108 gpd
Rooming House	149 rooms	187.2 gpd/room	27,893 gpd
Total Proposed Average Water Consumption			*33,804 gpd*
Total Proposed Peak Water Consumption[4]			*84,510 gpd*
Net Average Water Consumption			***7,500 gpd***
Net Peak Water Consumption			***18,750 gpd***

gpd = gallons per day; ksf = thousand square feet
[1] Water consumption rates are assumed as 120 percent of the wastewater generation rates provided in Table 4.14-2 to estimate potable supply.
[2] Numbers may be slightly off due to rounding.
[3] Existing water consumption was conservatively assumed to be based only on the portion of the building that is leased as of January 2024.
[4] Peak average daily flow was calculated by multiplying total flow by a 2.5 peak factor.

Source: LACSD, Table 1: Loadings for Each Class of Land Use, https://www.lacsd.org/home/showpublisheddocument/3644/637644575489800000. Accessed June 7, 2024.

The 2020 UWMP LBUD projects that water supplies will be sufficient to meet all demands through the year 2050 during normal, single dry year, and multiple dry year hydrologic conditions. Particularly, the City anticipates a surplus of 30,788 acre-feet for the year 2025, including normal year, single dry year, and multiple dry years. The Project's net average water demand of 7,500 gpd, or 8.4 AFY, represents approximately 0.03 percent of the City's surplus water supply in 2025 during normal, single dry year, and multiple dry year conditions. Furthermore, the City has stated that the City's surplus water supply would increase through the year 2050 by reducing imported water purchases, and continuing to invest in groundwater production, recycled water use, and water conservation; accordingly, the Project's proposed water demand would conservatively comprise approximately 0.03 percent of the City's water supply in 2050 during all hydrological conditions.[7] Therefore, there would be sufficient water supply for operation of the Project.

Additionally, the Project would install numerous water supply efficiency features, such as water-conserving plumbing fixtures, pursuant to CALGreen water efficiency and conservation standards. Furthermore, pursuant to LBMC Chapter 21.42, *Landscaping Standards,* proposed landscaping would include drought-tolerant and native plant materials, submit a Landscape Document Package at the time of Project plan check filing for approval by the City, and implement water efficient landscaping standards set forth by the State Model Water Efficient Landscape Ordinance (MWELO). The implementation of these regulations and standards would further reduce the Project's water usage during Project operations compared to existing conditions.

Prior to the issuance of building permits, the City would determine the fees associated with connecting to existing water utilities infrastructure. Payment of fees is intended to offset incremental impacts to infrastructure by helping fund capital improvements and expenditures. Additionally, all proposed water infrastructure improvements on-site would be conducted according to applicable technical and engineering requirements as laid out by the LBUD Engineering Bureau. The availability and sufficiency of the public water facilities that the Project would connect to, which includes the 12-inch DI water line on Pacific Coast Highway and the 8-inch AC-KA water line on East Anaheim Street, shall be confirmed by conducting a hydraulic study and demand calculation for the water system. Potable water will be made available for the Project in accordance with Long Beach Utilities Rules and Regulations for Potable Water, Reclaimed Water, and Sanitary Sewer.

As the Project's water demand would not exceed available water supply and the Project would comply with design efficiency requirements, the Project would not require or result in the relocation or construction of new or expanded water facilities and any impact would be less than significant.

Wastewater and Wastewater Treatment

Construction activities for the Project could result in temporary wastewater generation on-site. However, such generation would be temporary when compared with the wastewater generated by the Project. In addition, construction workers would typically utilize portable restrooms and hand wash areas, which are anticipated to utilized imported water and would not contribute to direct wastewater flows to the City's wastewater system. Thus, wastewater generation from

[7] LBUD, 2020 Urban Water Management Plan, 2020, page ES-1, https://www.lbutilities.org/files/sharedassets/utilities/v/1/about-us/documents/lbwd_uwmp2020_final_errata_revised.pdf. Accessed June 11, 2024.

Project construction activities is not anticipated to cause any measurable increase in wastewater flows.

The Project would result in the development of 149 student residential suites and associated amenities including laundry facilities and a fitness area. **Table 4.14-4: Estimated Project Wastewater Generation** shows that the estimated net average wastewater flow generated by Project operations is 6,250 gpd, with a peak generation of 15,625 gpd.

Table 4.14-4: Estimated Project Wastewater Generation

Proposed Land Use	Size	Wastewater Generation Rate[1]	Wastewater Generation Flow (gpd)[2]
Existing Land Use			
Office Building	109.6 ksf	200 gpd/ksf	21,920 gpd
Total Existing Average Wastewater Generation			*21,920 gpd*
Total Existing Peak Wastewater Generation[3]			*54,800 gpd*
Proposed Land Use			
Manager Office	0.451 ksf	200 gpd/ksf	90.2 gpd
Gym/Fitness	2.147 ksf	600 gpd/ksf	1,288 gpd
Club	0.993 ksf	125 gpd/ksf	124 gpd
Laundry	0.895 ksf	3,825 gpd/ksf	3,423 gpd
Rooming House	149 rooms	156 gpd/room	23,244 gpd
Total Proposed Average Wastewater Generation			*28,170 gpd*
Total Proposed Peak Wastewater Generation[3]			*70,245 gpd*
Net Average Wastewater Generation			***6,250 gpd***
Net Peak Wastewater Generation			***15,625 gpd***

gpd = gallons per day; ksf = thousand square feet
[1] Wastewater generation rates were obtained from LACSD's sewer loadings for each class of land use.
[2] Numbers may be slightly off due to rounding.
[3] Peak wastewater generation was calculated by multiplying wastewater consumption by a 2.5 peak factor.
Source: Kimley-Horn, Utility Memorandum, 2024.

According to the Utility Memorandum, the Project would discharge to the existing 8-inch sewer line within East Anaheim Street before being conveyed to LACSD's Joint Outfall Unit 3D Trunk Sewer. The LACSD's 51-inch diameter trunk sewer has a capacity of 29.4 million gallons per day (mgd) and conveyed a peak flow of 9.7 mgd in when last measured in 2020. The net wastewater generated by the Project would be treated at the A.K. Warren Water Resource Facility, which has a capacity of 400 mgd. As shown in **Table 4.14-4** above, the Project is expected to generate an average of approximately 6,250 gpd, or 0.006 mgd, of additional sewer discharge to the existing 8-inch sewer line within East Anaheim Street. The estimated wastewater flow from the Project would therefore be within the existing capacity of the trunk sewer and A.K. Warren Water Resource Facility. Furthermore, the LACSD regularly prepares an Integrated Regional Water Management Plan (IRWMP) to guide the development and management of its facilities over 20-year planning horizons based on forecasted growth. As detailed in **Section 4.11, Population and Housing**, the Project is within the expected growth of the City and is therefore within the capacity planning already conducted by LACSD.

According to a Will Serve Letter issued by LACSD in November 2023, the sewer infrastructure currently serving the Project Site may not have capacity to support the Project. Improvements to establish utility connections at and around the Project Site would be implemented as necessary as part of the construction of the Project and is not expected to result in a substantial environmental impact. Any new and replaced utilities installed underground would be connected to existing local and regional utility providers and the wider utility infrastructure. The Project would represent a decrease in generated wastewater and is within the population growth forecasts used by LACSD in facility planning. Additionally, prior to the issuance of building permits, the City would

determine the fees associated with connecting to existing wastewater utilities infrastructure. Payment of fees is intended to offset incremental impacts to infrastructure by helping fund capital improvements and expenditures.

Therefore, additional wastewater infrastructure would not be needed, and the Project would have a less than significant impact regarding wastewater and wastewater treatment facilities.

Stormwater Drainage

According to the Hydrology Report, the proposed on-site drainage improvements would include minimal changes to the existing drainage and stormwater infrastructure on-site. The Project would install permeable turf and permeable pavers surrounding the pool. The Project has the potential to decrease the overall runoff. Similar to existing conditions, on-site runoff from development of the Project would continue to be discharged to the existing storm drain and catch basin system north of the Project Site. Since the total runoff from the Project Site is anticipated to decrease under post-development conditions, it is assumed that the existing storm drain system has adequate capacity for the Project. The proposed stormwater system is discussed in greater details in **Section 4.11, Hydrology and Water Quality**. The Project would not require development of additional stormwater infrastructure off the Project Site. For these reasons, the Project would not require the construction of new stormwater drainage facilities off-site, and impacts would be less than significant.

Electricity and Natural Gas

As described in **Section 4.4, Energy**, of this EIR, the amount of electricity used during construction would be minimal; typical demand would stem from the use of electrically powered hand tools during the hours of construction activities. As Project construction would include negligible earthwork due to being an adaptive reuse of an existing building, electricity use during construction would be negligible. Additionally, the Project's projected electricity demand during Project operations would result in a negligible increased demand compared to SCE's overall demand. It is also noted that the Project (i.e., design and materials) would be subject to compliance with the 2022 Building Energy Efficiency Standards and CALGreen standards.

Regarding natural gas, construction activities typically do not require natural gas. Additionally, the Project's projected natural gas demand during Project operations would represent a negligible increase compared to the County's overall natural gas consumption increase.

For the reasons substantiated above, the Project would not require the construction of new electricity or natural gas facilities, and impacts would be less than significant.

Telecommunications

The City intends on expanding the capacity of existing facilities and adding more fiber optic facilities to address the growing demand for faster cable speeds, greater bandwidth, more reliable data transmission, and to accommodate more flexibility in the future. Therefore, although the Project involves the adaptive reuse of an existing building, the Project could result in the need for additional telecommunications facilities.

It is expected that AT&T, Spectrum, and Frontier would continue to expand infrastructure capacity if necessary to meet demand increases within their service area. The Project would be served by the existing telecommunications infrastructure surrounding the Project Site and would be anticipated to incorporate site-specific infrastructure improvements, as appropriate.

Environmental impacts associated with such improvements are anticipated to be minimal.[8] Additionally, prior to the issuance of building permits, the City would determine the fees associated with connecting to existing telecommunication utilities infrastructure. Payment of fees is intended to offset incremental impacts to infrastructure by helping fund capital improvements and expenditures. Therefore, the Project would result in less than significant impacts regarding telecommunication infrastructure.

For the reasons substantiated above, the Project would not require the construction of new water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities off-site. Therefore, impacts associated with both construction and operation of the Project would be less than significant.

Threshold UTI-2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact UTI-2: Less Than Significant Impact.

As discussed in Threshold UTI-1, during Project construction, water would be required for dust control and equipment cleaning. However, it is anticipated that water would be imported and connections to the City's water infrastructure would not be necessary. In addition, the contractor would install portable restrooms and hand washing stations which are also anticipated to utilize imported water.

As shown in **Table 4.14-3** above, the estimated net average water demand during Project operations compared to existing conditions is approximately 7,500 gpd. However, the Project's estimated net average water demand represents approximately 0.03 percent of the City's projected surplus water supply in 2025 during all hydrological conditions. Furthermore, the City has stated that the City's surplus water supply would increase through the year 2050 due to conservation of supplies and improved reclamation efforts; accordingly, the Project's proposed water demand would comprise approximately 0.03 percent of the City's water supply in 2050 during all hydrological conditions. Moreover, through compliance with local and State water conservation and efficiency standards, water usage during Project operations would be further reduced. Therefore, LBUD would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, and impacts would be less than significant.

Threshold UTI-3: Would the project result in a determination by the wastewater treatment provider which services of may serve the project that is has adequate capacity to serve the project's projected demand in addition to the provider's existing commitment?

Impact UTI-3: Less Than Significant Impact.

As discussed in Threshold UTI-1, construction activities for the Project could result in temporary wastewater generation on-site. However, such generation would be temporary when compared with the wastewater generated by the Project. In addition, construction workers would typically utilize portable restrooms and hand wash areas, which are anticipated to utilized imported water and would not contribute to direct wastewater flows to the City's wastewater system. Thus,

[8] City of Long Beach, Addendum No. 2 to the Environmental Impact Report for the General Plan Land Use and Urban Design Elements Project, 2021, pages 3-95 to 3-96, https://files.ceqanet.opr.ca.gov/162983-9/attachment/mdMtUWk6XTyX9V8Y1gBH9m7E22p-9S1IMf_LyuphCyk-AgsQU5mkBL2lcGyoF_nbAVD7t3DS-KOm5R9p0. Accessed June 10, 2024.

wastewater generation from Project construction activities is not anticipated to cause any measurable increase in wastewater flows.

As discussed in Threshold UTI-1, wastewater generated by the Project would be treated at the A.K. Warren Water Resource Facility, which has a capacity of 400 mgd. As shown in **Table 4.14-4** above, the Project is expected to increase average wastewater flow by approximately 6,250 gpd, or 0.006 mgd. Therefore, the estimated wastewater flow from the Project would be within the existing capacity of the trunk sewer and A.K. Warren Water Resource Facility. Therefore, the Project would not significantly affect the treatment capacity of the A.K. Warren Water Resource Facility, and impacts would be less than significant.

Threshold UTI-4: Generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure?

Threshold UTI-5: Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impacts UTI-4 and UTI-5: Less Than Significant.

The Project would involve the adaptive reuse of the existing office building on-site. Accordingly, there would be limited waste from waste generated by Project construction. Pursuant to the Integrated Waste Management Act (AB 939), the State of California, through CALGreen, requires that at least 65 percent of waste produced by construction and demolition (C&D) projects be diverted from landfills through recycling, salvage, or deconstruction. In 2007, the City adopted a C&D Debris Recycling Program pursuant to AB 939. All new construction in the City is subject to the requirements of the ordinance.

The Project would generate minimal construction waste as a result of adaptive reuse of the existing building on the Project Site.

The City of Long Beach Environmental Services Bureau is responsible for managing solid waste disposal and recycling in the City. The City contracts with Waste Management for recycling collection services. In the City, solid waste, excluding recyclables, is diverted to one of the County's several landfills or to the SERRF to be incinerated and used in the production of energy. As of 2020, Los Angeles County's solid waste disposal facilities had a remaining capacity of 142.67 million tons.[9] This would provide adequate capacity to address solid waste generated by construction of the Project. Regardless, pursuant to AB 939, the State requires that at least 65 percent of waste produced by construction and demolition (C&D) projects be diverted from landfills through recycling, salvage, or deconstruction. The City requires a C&D Management Plan as a means of documenting project compliance with CALGreen regulations and LBMC Chapter 18.67, *Construction and Demolition Recycling Program*.

Project operations would generate waste typical of similar residential development. As shown in **Table 4.14-5: Solid Waste Generation**, the Project would generate on average a net increase of 624 pounds of solid waste daily or 0.31 tons per day. Again, this would be well within the capacity of the County's solid waste disposal facilities.

Development of the Project would require compliance with all applicable federal, State, and local management and reduction statutes and regulations related to solid waste. Project operations would be required to meet CalRecycle's waste diversion rate target of 50 percent as required

[9] Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, 2021, page 35, https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=16231&hp=yes&type=PDF. Accessed August 1, 2024.

under AB 939. Project building occupants would also be required to adhere to the requirements of AB 1826 addressing diversion of organic waste through provision of organic waste recycling bins.

The Project would not generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, and would comply with CALGreen, State regulations, and City regulations regarding solid waste management. Accordingly, any impacts would be less than significant.

Table 4.14-5: Solid Waste Generation

Land Use	Size	Waste Generation Rate	Total Waste Generated (lbs/day)	Total Waste Generated (tons/day)
Existing Land Use[1]				
Office	109.6 ksf [2]	6 lbs/ksf/day	657.6 lbs/day	0.33 tons/day
Proposed Land Use				
Multifamily[3]	149 du	8.6 lbs/du/day	1,281 lbs/day	0.64 tons/day
Project Net Waste Generation			***624 lbs/day***	***0.31 tons/day***

sf = square feet, ksf = thousand square feet, lbs = pounds, du = dwelling unit
[1] It was conservatively assumed that no demolition or construction solid wastes would be produced, as the Project is an adaptive reuse project.
[2] Existing solid waste generation was conservatively assumed to be based on only the portion of the existing building that is currently leased as of January 2024.
[3] Proposed student residential use is assumed to constitute a "Multifamily" use per CalRecycle.
Source: CalRecycle, Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates. Accessed June 10, 2024.

Cumulative Impacts

Section 3.3, Cumulative Development, identifies no related projects within an approximately 1-mile radius of the Project Site that are planned, under construction, or have been recently completed. However, for purposes of identifying cumulative impacts to utilities and service systems, the geographic scope is focused on the City. Implementation of the Project in combination with projects in the City would lead to an increase in demand on electric power, telecommunications service, water supplies, wastewater treatment capacity, and solid waste disposal. However, current suppliers of these services have sufficient capacity to meet the demands of the Project and the cumulative projects. As previously discussed, the City of Long Beach has adequate existing infrastructure to serve the electrical, telecommunications, water, and wastewater demands of the Project and the cumulative projects without need for relocation or construction of new and expanded infrastructure. In addition, the City of Long Beach anticipates a water supply surplus of 30,788 AFY and 36,182 AFY during 2025 and 2050, respectively for normal, single dry year, and normal dry year conditions. The A.K Warren Water Resource Facility, which serves the Project Site has a design capacity of 400 mgd of wastewater. Finally, as of 2020, Los Angeles County's solid waste disposal facilities had a remaining capacity of 142.67 million tons. The demands of the Project in combination with the cumulative projects would not exceed capacity for any of these utilities or service systems.

Similar to the Project, each of the projects in the City would be evaluated for demand on utilities and service systems. City projects would be required to comply with the applicable regulatory requirements and applicable mitigation to reduce potential impacts to these resources. Accordingly, cumulative impacts to utilities and service systems are less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Project-specific and cumulative impacts related to utilities and service systems would be less than significant.

5. Alternatives

5.1 Introduction

CEQA Guidelines Section 15126.6(a), requires that an EIR "describe a range of reasonable alternatives to the Project, or to the location of the 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." This chapter presents the alternatives analysis required by CEQA for the Project, summarizes the Project, identifies the Project objectives, describes the alternatives to be analyzed, and discusses the alternatives considered but eliminated from further analysis. The impacts associated with each alternative are then described by environmental topic discussed in **Chapter 4, Environmental Impact Analysis**, and compared with those of the Project. Based on this alternatives analysis, and as required by CEQA, this chapter concludes by identifying the environmentally superior alternative.

5.2 Project Summary

As described in **Chapter 2, Project Description**, of this Draft EIR, the Project is located on a 51,048 square feet (sf) (1.2 acres) triangular-shaped parcel located at 5150 East Pacific Coast Highway (Project Site) in the City of Long Beach (City). The Project Site consists of one parcel (Assessor Parcel Number 7220-018-009). The Project Site is currently developed with an existing seven-story office building with three levels of subterranean parking. The existing office building is approximately 120,000 square feet, of which 109,600 square feet is currently leased.

The Project would adaptively reuse the entire existing building into a private dormitory (housing for students). The first level of the Project would consist of administrative/management offices and various amenities including a lobby, mail room, kitchen and dining area, study room, laundry facilities, fitness area, and a men and women's locker room. A total of 593 beds in 149 student residential suite would be located on the second to seventh floor. Suites would range from one - person suites to six person suites for a total of 73,486 sf of residential area.

The Project would include three levels of subterranean vehicular parking, for a total of 133,163 SF. There would be a total of 364 parking stalls (218 standard spaces, 19 accessible spaces, 127 tandem spaces). The Project would also include 150 bicycle parking spaces on the first floor of subterranean parking. Outdoor amenities would be located throughout the Project Site, including a fitness turf, wading pool, shade structure, and flexible lawn east of Clark Avenue, and an outdoor dining patio west of the Pacific Coast Highway. The exterior of the building would remain the same, with the addition of decorative window film and improvements to the ground level entryways; however, the majority of the adaptive reuse would involve tenant improvements to the interior of the building.

5.3 Project Objectives

Section 2.7, Project Objectives within **Chapter 2, Project Description,** of this Draft EIR describes the underlying purpose and primary objective of the Project, which is to adaptively reuse an existing office building and transform it into student housing. The Project would include campus style residential suites and private open space and other amenities. As further required by the CEQA Guidelines, the specific objectives of the Project are provided below:

The objectives of the Project are:

- Fulfill the City's housing goals by expanding student housing opportunities in proximity to open space, public transportation, and a wide range of services and goods.
- Promote sustainable development through the adaptive reuse of an existing seven-story office building into a 593-bed student housing development that includes supportive uses and amenities that promote interaction and communication between students such as large lounge areas and active outdoor recreational areas.
- Promote pedestrian and bicycle safety and access to the Project Site by engaging with the existing dedicated bike throughfare along Pacific Coast Highway with bicycle parking and lockers on the subterranean parking level 1.
- Increase access to alternative transportation options on the Project Site including zip cars and electric scooters. Increase accessibility to the Project Site through a dedicated ride share pick-up and drop-off locations along East Anaheim Street.
- Provide a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design, including light materiality, landscape features, and active ground floor uses with open space amenities.
- Provide safe student housing through terraced landscape buffers and a security fence and gate.
- Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions through such features as a PV solar panel array, electric vehicle charging stations, energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping.

5.4 Project Impacts

Based on the environmental analysis completed for the Project and discussed in **Chapter 4, Environmental Impact Analysis**, there are no significant and unavoidable impacts identified.

Significant impacts requiring mitigation have been identified for the following environmental resource factors:

- Cultural Resources
- Geology and Soils (Paleontological Resources)
- Tribal Cultural Resources

Less than significant impacts were identified in the following environmental resource factors:

- Aesthetics
- Air Quality
- Biological Resources
- Energy

- Geology and Soils
- Greenhouse Gas Emissions,
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems

No impacts were identified for the following environmental resource factors:

- Agricultural and Forestry Resources
- Mineral Resources
- Wildfire

5.5 Summary of Project Alternatives

This section of the Draft EIR considers four alternatives to the Project. These alternatives include:

- Alternative 1: No Build/No Project
- Alternative 2: Market Rate Housing
- Alternative 3: Senior Living and Student Housing
- Alternative 4: Student Housing and Office Space

Consistent with CEQA Guidelines Section 15126.6(c), Alternatives 1 through 4 represent reasonable "build" alternatives that could feasibly accomplish the Project objectives discussed in **Section 5.3, Project Objectives**, and could potentially lessen the environmental impacts of the Project. Per CEQA Guidelines Section 15126(e), the alternatives analysis includes a "No Build/No Project" alternative. The purpose of describing and analyzing the "No Build/No Project" alternative is to allow decisionmakers the ability to compare the impacts of approving the Project with the impacts of not approving the Project.

The alternatives are described in greater detail below. Each alternative is described and evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project objectives could be substantially attained by the alternative. It should be noted that the alternatives analysis excludes those impact thresholds for which the Project results in no impact, as summarized in **Table ES-1**.

The evaluation of each of the alternatives follows the format described below:

- A description of the alternative.
- The environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental issue area analyzed in the Draft EIR.
- Environmental impacts of the alternative and the Project are compared for each environmental issue area evaluated in **Chapter 4, Environmental Impact Analysis**.
    - If the alternative's impact would be clearly substantially less adverse than the impact of the Project, the comparative impact is described as "less."
    - If the alternative's impact would clearly be more adverse than the proposed Project, the comparative impact is described as "greater."
    - Where the impacts of the alternative and the Project would be roughly equivalent, the comparative impact is said to be "similar."
- The evaluation also documents whether the alternative's impact, when compared to the Project, would be entirely avoided; whether a significant impact under the Project could be reduced to a less than significant level under the alternative; or whether a significant unavoidable impact under the alternative could be feasibly mitigated to a less than significant level.
- The comparative analysis of the impacts is followed by a general discussion of the extent to which the underlying purpose and Project objectives would be attained by the alternative.

At the end of this section, the comparative impacts of the Project and the alternatives are summarized in **Table 5-1: Comparison of the Impacts of the Project Alternatives**, below. Pursuant to CEQA Guidelines Section 15126.6(e)(2) an Environmentally Superior Alternative is identified.

5.5.1 Alternative 1: No Build/No Project

Description of the Alternative

Pursuant to Section 15126.6(e)(3)(B) of the CEQA Guidelines, Alternative 1, the "No Build/No Project" Alternative, represents the circumstance under which the Project does not proceed. Under Alternative 1 it is assumed that the existing development on the Project Site would remain as is and no new development would be implemented. As discussed in **Chapter 2, Project Description**, of this Draft EIR, the Project Site is a 51,048 sf (1.2 acres) triangular shaped parcel currently developed with a seven-story office building and three levels of subterranean parking built in 1981. The existing office building is approximately 120,000 sf, of which 109,600 sf is currently leased (as of January 2024). The western side of the Project Site adjacent to Clark Avenue includes a surface parking lot, driveway, and landscaping. There is signage for the existing office building on the northern corner of the Project Site along Pacific Coast Highway. Under Alternative 1, the Project Site and existing facilities would remain unchanged.

Impact Analysis

Aesthetics

As discussed in **Section 4.1, Aesthetics** of the Initial Study, included in **Appendix A** of this Draft EIR, impacts to scenic vistas and scenic resources were determined to have no impact.

AES-3 If in a non-urbanized area, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings?

As discussed in the Initial Study, provided in **Appendix A** of this Draft EIR, the Project is in a highly urbanized area and is surrounded by developed office, residential, and commercial uses. The Project would adaptively reuse an existing seven-story office building and transform it into private student housing. The Project is proposing a General Plan Amendment from the current Community Commercial (CC) Placetype to the Neighborhood Serving Center or Corridor (NSC-Moderate) Placetype which would permit residential uses. The Project would also require a Zoning Code Amendment/Map Change to change the existing zone from Community Commercial Automobile-Oriented (CCA) to Mixed-Use (MU-3) to allow for the Project's student residential uses and to enable adaptive reuse development standards.

The Project would be consistent with the development standards and regulations of the MU-3 Zoning District, upon approval of the Zoning Amendment, including standards governing scenic quality, including building height, residential density, and FAR. As the Project would comply with the required standards and other applicable local regulations pertaining to visual quality, the Project would not conflict with applicable zoning and local regulations governing scenic quality and impacts on scenic quality would be less than significant.

Under Alternative 1, there would be no construction or any other type of activity on the Project Site and the existing land use would remain unchanged. Therefore, Alternative 1 would not conflict with applicable zoning and local regulations governing scenic quality and there would be no impacts on scenic quality. Thus, impacts with regard to visual character or quality of public views would be less under Alternative 1 than the Project.

AES-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views.

The Project Site is located in a highly urbanized area with existing sources of light. Existing outdoor lighting in areas around the Project Site includes street lighting along Pacific Coast Highway, Anaheim Street, Clark Avenue, and lighting from surrounding residential, office, and commercial buildings. The existing building includes lighting within entryways, parking areas, and light emitting from interior office uses. As the Project is situated in an urban area that is already well illuminated, lighting from the Project would be similar to existing conditions in areas surrounding the Project Site. While the Project would introduce new light sources related to new open space, amenity areas, and more active residential uses, lighting developed as part of the Project would be required to comply with LBMC Chapter 22.30.110, Lighting Design for Safety. As required, lighting is required to be directed and shielded to prevent light and glare from intruding onto adjacent sites, and light standards are not to exceed the building height and be appropriately spaced from adjacent property lines. Therefore, nighttime views in the area would not be affected by light generated by the Project.

The exterior of the building would largely remain the same. Minor additions such as decorative window films, identification signage, a small pavilion building, improvements to the ground level entryways, and open space areas would not involve the use of highly reflective materials known to cause such glare. Therefore, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and impacts would be less than significant.

Under Alternative 1, there would be no construction or any other type of activity on the Project Site and the existing land use would remain unchanged. Therefore, Alternative 1 would not create new source of substantial light or glare which would adversely affect day or nighttime views and there would be no impacts related to light or glare. Thus, impacts related to glare would be less under Alternative 1 than the Project.

Air Quality

AQ-1) Conflict with or obstruct implementation of applicable air quality plan?

As discussed in **Section 4.2, Air Quality**, of this Draft EIR, the Project was evaluated for its potential to conflict with or obstruct implementation of an applicable air quality plan using the SCAQMD's 2022 AQMP, which establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving State and national air quality standards. The AQMP's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's RTP/SCS, which includes the latest growth forecasts for the region and provides updated emission inventory methodologies for various source categories. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. As the Project would not generate localized construction or regional construction or operational emissions that would exceed SCAQMD thresholds of significance, the Project would not violate any air quality standards. It is also noted that the Project's construction and operational air emissions would not exceed the SCAQMD regional thresholds, and localized emissions during construction and operations would not exceed SCAQMD LST thresholds. Therefore, the Project would not conflict with or obstruct implementation of the applicable air quality plan, and impacts would be less than significant.

Under Alternative 1, there would be no construction or any other type of activity on the Project Site and the existing land use would remain unchanged. As Alternative 1 would involve no

construction or operations, there would be no increase in emissions that would exceed regional significance thresholds for the CAAQS or NAAQS. As Alternative 1 would involve no construction or operations, there would be no increase in emissions that would exceed regional significance thresholds for the CAAQS or NAAQS. Therefore, Alternative 1 would not conflict with or obstruct implementation of an applicable air quality plan; therefore, there would be no impacts. Thus, impacts with regard to conflicts with air quality management plans would be less under Alternative 1 than the Project.

AQ-2) Cumulative increase in criteria pollutants/violation of air quality standards.

As discussed in **Section 4.2, Air Quality**, Project construction emissions would be below SCAQMD's threshold for all criteria pollutants. Additionally, Project operational emissions would not exceed SCAQMD thresholds. Furthermore, construction and operational emissions would not result in a cumulative increase in criteria pollutants or a violation of air quality standards. Impacts to air quality associated with construction and operation of the Project would be less than significant. Thus, impacts with regard to air quality would be less under the Alternative 1 than the Project.

Under Alternative 1 there would be no construction or any other type of activity on the Project Site and the existing land use would remain unchanged. Therefore, Alternative 1 would be consistent with the SCAQMD's consistency criteria and avoid the Project's less than significant impacts. There would be no impacts to air quality associated with air quality standards and impacts would be less under Alternative 1 than the Project.

AQ-3 Expose sensitive receptors to substantial pollutant concentrations.

As discussed in **Section 4.2, Air Quality,** of this Draft EIR, the nearest sensitive receptors are the residences located approximately 170 feet (approximately 52 meters) to the west of the Project Site. As described in **Section 4.2, Air Quality**, Project construction emissions and operational emissions would not exceed SCAQMD thresholds and impacts would be less than significant. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations and any impacts would be less than significant.

Alternative 1 would involve no construction or operations that would generate increased emissions at the Project Site. Accordingly, Alternative 1 would not result in increased exposure of sensitive receptors to pollutant concentrations and there would be impacts to sensitive receptors. Thus, impacts would be less under Alternative 1 than the Project.

AQ-4) Other emissions (such as those leading to odors).

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the Project would have a less than significant impact related to odors. The Project is a residential building for students and does not propose to include any odor-inducing uses on the Project Site. Therefore, the Project would result in a less than significant impact related to other emissions leading to odors adversely affecting a substantial number of people.

Alternative 1 would involve no construction nor operations that would produce emissions such as those that would produce new or increased odors at the Project Site compared to existing conditions. Accordingly, Alternative 1 would not generate odors. Thus, there would be no impacts and impacts would be less under Alternative 1 than the Project.

Biological Resources

As discussed in **Section 4.4, Biological Resources** of the Initial Study, included in **Appendix A** of this Draft EIR, impacts to the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan were determined to have no impact.

BIO-1) Adverse effect on any species identified as a candidate, sensitive, or special status species.

BIO-2) Adverse effect on any riparian habitat or other sensitive natural community

BIO-3) Adverse effect on state or federally protected wetlands

BIO-4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species.

BIO-5) Conflict with any local policies or ordinances protecting biological resources.

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR the Project would have a less than significant impact to biological resources, including adverse effects on any special status species, riparian habitat or other sensitive natural community, federally protected wetlands, native resident or migratory fish and wildlife species, and would not conflict with any local policies or ordinances protecting biological resources. Therefore, impacts to biological resources be less than significant.

Alternative 1 would involve no construction nor operations on the Project Site that would impact biological resources. Therefore, there would be no impacts to biological resources, and impacts would be less under Alternative 1 than the Project.

Cultural Resources

As discussed in **Section 4.5, Cultural Resources**, in the Initial Study, included in **Appendix A** of this Draft EIR, impacts to historical resources pursuant to § 15064.5 were determined to have no impact.

CUL-2) Significance of an archaeological resource.

As discussed in **Section 4.3, Cultural Resources**, of this Draft EIR, the Cultural Resources Assessment prepared by BCR Consulting LLC on May 23, 2024 (**Appendix C**) indicates the records search and field survey conducted by BCR Consulting, LLC did not yield any cultural resources within the Project Site boundaries. The Project Site's conditions failed to indicate sensitively for buried archaeological resources due to the Project Site's severely disturbed state associated with excavation, grading, and construction of the existing office building. Construction activities for the Project would involve minimal demolition and excavation. However, earthwork activities could uncover previously known or unknown archaeological resources. Implementation of **Mitigation Measure CUL-1, Inadvertent Discovery of Cultural Resource**, would provide a process for treatment of any archaeological resources inadvertently discovered during Project implementation and would reduce impacts to archaeological resources to less than significant.

Alternative 1 would involve no construction nor operations that would result in site disturbance that could impact archaeological resources. As such, Alternative 1 would avoid the Project's less than significant impact (after mitigation) related to the potential of any impacts to archaeological resources. Thus, Alternative 1 would have no impacts related to archeological resources and impacts would be less under Alternative 1 than the Project.

CUL-3) Disturbance of human remains.

As discussed in **Section 4.3, Cultural Resources**, of this Draft EIR, the Cultural Resources Assessment prepared by BCR Consulting LLC (**Appendix C**) indicates that the Project Site has a low potential for intact surface or subsurface human remains due to the level of previous development. However, it is possible that earthwork activities could uncover human remains that were present within the Project area and were not recorded before or during development. Implementation of **Mitigation Measure CUL-2, Inadvertent Discovery of Human Remains**, would provide a process for treatment of any human remains inadvertently discovered during Project implementation, including requiring a cessation of construction activity until the County coroner can evaluate the discovery and make the necessary findings. With implementation of this mitigation measure, impacts to human remains would be less than significant.

Alternative 1 would involve no construction nor operations that would result in site disturbance that could affect human remains. As such, Alternative 1 would avoid the Project's less than significant impact (after mitigation) related to the potential to any impacts to human remains. Thus, Alternative 1 would have no impacts related to the disturbance of human remains and impacts would be less under Alternative 1 than the Project.

Energy

ENG-1) Wasteful, inefficient, or unnecessary consumption of energy resources.

As discussed in **Section 4.4, Energy** of this Draft EIR, Project construction would consume energy due to fuel use by construction equipment as well as on-road vehicles used by construction employees, vendors, and for hauling materials. It is anticipated that diesel and gasoline would be supplied by existing commercial fuel providers serving the Project area and region. Project construction, including construction-related vehicle trips, would be temporary and would not require ongoing or permanent commitment of diesel fuel or gasoline resources for this purpose. Project construction would use electricity to power construction trailers, electrical equipment, site lighting, and some construction equipment. The energy consumption associated with Project operations would occur from building energy (electricity and natural gas), use, water use, and transportation-related fuel use. The Project (i.e., design and materials) would be subject to compliance with the 2022 Building Energy Efficiency Standards. The Project would also be required to comply with CALGreen, which establishes planning and design standards for sustainable site development, energy efficiency (more than California Energy Code requirements), water conservation, material conservation, and internal air contaminants. Therefore, construction and operation of the Project would not result in wasteful, inefficient, and unnecessary consumption of energy, and impacts would be less than significant.

Alternative 1 would involve no construction nor operations that would require new or increased energy use on the Project Site and would not generate an increase in demand for energy compared to existing conditions. As such, Alternative 1 would avoid the Project's less than significant energy consumption impacts during construction and operation. Thus, there would be no impacts with regard to energy consumption and impacts would be less under Alternative 1 than the Project.

ENG-2) Conflict with Plans for renewable energy or energy efficiency.

As discussed in **Section 4.4, Energy**, of this Draft EIR, the Project would support and promote the use of renewable energy and energy efficiency and would result in less than significant impacts. The Project would support Statewide and regional efforts to incorporate green building design features and improve energy efficiency in order to reduce wasteful or inefficient energy consumption. Overall, the Project would support and promote the use of renewable energy and energy efficiency, therefore, impacts would be less than significant.

Alternative 1 would not involve any new development or increase energy use on the Project Site that would generate an increase in demand for energy compared to existing conditions. Accordingly, Alternative 1 would have no impact regarding efficient energy consumption. As such, Alternative 1 would avoid the Project's less than significant energy consumption impacts during construction and operation. Thus, Alternative 1 would have no impacts with regard to energy consumption and impacts would be less under Alternative 1 than the Project.

Geology and Soils

As discussed in **Section 4.7, Geology and Soils** of the Initial Study, included in **Appendix A** in this Draft EIR, the Project would have no impact related to geology and soils, including: rupture of a known earthquake fault; seismic-related ground failure liquefaction; landslides; lateral spreading, subsidence, liquefaction or collapse; and expansive soils. The Project would not include use of septic tanks or alternative wastewater.

GEO-1ii) Strong seismic ground shaking

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the Project Site would not directly or indirectly cause potential adverse effects involving seismic activity and impacts would be less than significant. The Project would involve the adaptive reuse of an existing office building. While the Project Site is located in the highly seismic Southern California region, development in the City is required to adhere to the California Building Standards Code (California Code of Regulations, Title 24) and the Uniform Building Code (UBC), as stated in LBMC Chapter 18.68, Earthquake Hazard Regulations. Therefore, the Project would not directly or indirectly cause potential adverse effects involving seismic ground shaking, and a less than significant impact would occur.

Alternative 1 would involve no construction nor operations; therefore, Alternative 1 would not directly or indirectly cause potential adverse effects involving seismic ground shaking; therefore, there would be no impacts. Thus, impacts related to strong seismic ground shaking would be less under Alternative 1 than the Project.

GEO 2) Result in substantial soil erosion or the loss of topsoil

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the Project would adaptively reuse an existing building and would require minimal grading and earthwork activities. Therefore, the Project would not result in substantial soil erosion or the loss of topsoil. Impacts would be less than significant.

Alternative 1 would involve no construction nor operations; therefore, Alternative 1 would have no impact on soil erosion or the loss of topsoil. Thus, impacts related to soil erosion, or the loss of topsoil would be less under Alternative 1 than the Project.

GEO-6) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

As discussed in **Section 4.5, Geology and Soils**, of this Draft EIR, the Project Site is in a highly urbanized environment that is fully developed. According to the Cultural Resources Assessment prepared by BCR Consulting LLC on May 23, 2024 (**Appendix C**), the Project Site is underlain by old shallow marine deposits from the Pleistocene epoch, with surrounding units of Holocene epoch sediment. Pleistocene units. Excavation activities associated with the development of the Project Site would impact the paleontologically sensitive Pleistocene alluvia units. However, excavation of the Project Site would be minimal due to the adaptive reuse of the existing structure. With implementation of **Mitigation Measure GEO-1, Paleontological Monitoring**, and **Mitigation Measure GEO-2, Paleontological Documentation** impacts to paleontological resources would be less than significant.

Alternative 1 would involve no construction nor operations; therefore, there would be no potential to destroy a unique paleontological resource. Alternative 1 would avoid the Project's less than significant impacts (after mitigation) related to the potential to directly or indirectly destroy paleontological resources during construction. Thus, there would be no impacts related to paleontological resources and impacts would be less under Alternative 1 than the Project.

Greenhouse Gas Emissions

GHG-1) Generation of GHG emissions.

As discussed in **Section 4.6, Greenhouse Gas Emission**, of this Draft EIR, the Project would generate GHG emissions due to construction and operational activities. The Project would generate approximately 817 $MTCO_2e$ annually from both construction and operations and would not exceed the SCAQMD's proposed GHG threshold of 3,000 $MTCO_2e$ per year. Therefore, impacts would be less than significant.

Alternative 1 would not include construction or other activity that would generate GHG emissions. Accordingly, because Alternative 1 would not involve new construction or a change in GHG emission-producing activity over existing conditions, it would result in no GHG emission impacts. Thus, impacts related to GHG emissions would be less under the Alternative 1 than the Project.

GHG-2) Conflict with applicable plans, policies, regulations, or recommendations.

As discussed in **Section 4.6, Greenhouse Gas Emissions,** of this Draft EIR, the Project would be consistent with statewide, regional, and local plans, policies, regulations, and recommendations to reduce GHG emissions from development. Accordingly, because Alternative 1 would not involve new construction or a change in GHG emission-producing activity over existing conditions, it would result in no GHG emission impacts, and no impacts regarding conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs would occur. As such, Alternative 1 would avoid the Project's less than significant impacts regarding conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Thus, there would be no impact related to GHG emissions and impacts would be less under Alternative 1 than the Project.

Hazards and Hazardous Materials

As discussed in **Section 4.9, Hazards and Hazardous Materials** of the Initial Study, included in **Appendix A** of this Draft EIR, the Project Site would not be included on a list of hazardous

materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would not create a significant hazard to the public or the environment. Therefore, it was determined that the Project Site would have no impact in regard to hazards to the public or the environment.

HAZ-1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

As discussed in **Section 4.7, Hazards and Hazardous Materials**, of this Draft EIR, construction activities required for the Project would involve interior and pavement demolition, pool construction, interior renovation and construction, and architectural coating. However, compliance with CalOSHA standards, SCAQMD Rules, and the SWPPP would reduce impacts to less than significant. Similarly, Project operations would involve use of common chemicals; however, compliance with applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential to release contaminants. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts would be less than significant.

Alternative 1 would not involve construction or alter existing activities on the Project Site; therefore, it would not change the potential for an accidental release of hazardous materials into the environment compared to existing conditions. Accordingly, because Alternative 1 would not involve new construction, activity, or uses that would create a hazard to the public involving the accidental release of hazardous materials into the environment, it would have no impact related to this hazard. Thus, impacts related to hazardous materials release would be less under Alternative 1 than the Project.

HAZ-2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

As discussed in **Section 4.7, Hazards and Hazardous Materials**, of this Draft EIR, the Project Site is not located on a hazardous sites list compiled pursuant to California Government Code Section 65962.5. Furthermore, Project operations would likely involve uses employing common maintenance and janitorial supplies, such as solvents, paints, and thinners for Project Site maintenance, herbicides, and pesticides for landscaping, and other common chemicals. Hazardous materials/chemicals such as cleaners, paints, solvents, and fertilizers in low quantities do not pose a significant threat related to the release of hazardous materials into the environment. Therefore, Project operations would not create a significant hazard to the public or the environment, and Project impacts during Project operations would be less than significant.

Alternative 1 would involve no construction nor operations on the Project Site; therefore, it would not change the potential for an accidental release of hazardous materials into the environment compared to existing conditions. Accordingly, Alternative 1 would have no impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Alternative 1 would avoid the Project's less than significant hazardous materials impact. Thus, there would be no impact and impacts would be less under Alternative 1 than the Project.

HAZ-3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing proposed school.

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the closest school is the Woodrow Wilson High School, located approximately 0.45 mile southwest from the Project

Site, at 4400 East 10th Street. No truck routes are located adjacent to Woodrow Wilson High School. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant.

Alternative 1 would involve no construction nor operations on the Project Site; therefore, it would not change the potential for an accidental release of hazardous materials within one-quarter mile of an existing or proposed school. Accordingly, Alternative 1 would have no impacts related to reasonably hazardous materials near schools and would avoid the Project's less than significant hazardous materials impact. Thus, impacts would be less under Alternative 1 than the Project.

HAZ-5) Located within an airport land use plan.

As discussed in **Section 4.7, Hazards and Hazardous Materials**, of this Draft EIR, the nearest airport to the Project Site is the Long Beach Municipal Airport, located 1.60 miles to the north of the Project Site. Nevertheless, as explained in **Section 4.10, Noise** of the Draft EIR, review of the Project's Airport Influence Area (AIA) map indicates that the Project is located outside the AIA boundaries. Additionally, there are no other airports or airstrips within 2.0 miles of the Project Site. As such, although the Project is located within two miles of a public airport, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area.

Alternative 1 would use the same Project Site as the Project. Therefore, although Alternative 1 is located within two miles of a public airport, Alternative 1 would not result in a safety hazard or excessive noise for people residing or working in the Project area. Alternative 1 would have no impact related to significant airport land use plans. Thus, impacts would be less under Alternative 1 than the Project.

HAZ-6) Interfere with an emergency response plan or emergency evacuation plan.

As discussed in **Section 4.7. Hazards and Hazardous Materials**, of the Draft EIR, the City's Natural Hazard Mitigation Plan was adopted in March 2023 and includes policies and programs to reduce the potential loss of life and property damage as a result of natural disasters. Project construction would not require the full or partial closure of roads. In addition, the Project would be reviewed by the Long Beach Fire Department (LBFD) to confirm that adequate emergency access for emergency vehicles is provided. Therefore, the Project would not interfere within an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Alternative 1 would involve no construction nor operations activities on the Project Site. Accordingly, Alternative 1 would have no impact with regard to development occurring on a hazardous materials site. As such, Alternative 1 would avoid the Project's less than significant hazardous impact. Thus, impacts related to the development on a hazardous materials site would be less under the Alternative 1 than the Project.

HAZ-7) Expose people or structures to significant risk of loss, injury or death, involving wildfires.

As discussed in the Initial Study included in **Appendix A** of this Draft EIR, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildfires. The Project Site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) for the State Responsibility Area (SRA) or the Local Responsibility Area (LRA). Accordingly, the Project would not expose people or structures, either directly or indirectly, to a significance risk of loss, injury, or death involving wildland fires, and impacts would be less than significant.

Alternative 1 would involve no construction nor operations activities on the Project Site. Accordingly, the Alternative 1 would have no impact with regard to injury or death involving wildfires. As such, Alternative 1 would avoid the Project's less than significant hazardous impact involving wildfires. Thus, there would be no impacts related to wildfires and impacts would be less under the Alternative 1 than the Project.

Hydrology and Water Quality

As discussed in **Section 4.10, Hydrology and Water Quality**, of the Initial Study, included in Appendix A of this Draft EIR, the Project Site would not be located in a flood hazard, tsunami, or seiche zones, and risk the release of pollutants. Therefore, impacts to flood hazards were determined to have no impact.

HWQ-1) Violate any water quality standards or waste discharge requirements or degrade surface or ground water quality.

As discussed in **Section 4.8, Hydrology and Water Quality** of this Draft EIR, construction activities associated with the development of the Project would require minimal excavation and grading, such activities may require the use of water for dust mitigation. Although the Project would require minimal excavation and grading, such activities may require the use of water for dust mitigation. Water from dust control and other liquids such as fuels, lubricants, and liquid wastes can create runoff that could temporarily affect water quality. However, such impacts to water quality would be temporary and would last only for the duration of the proposed construction activities. Implementation of the Project could introduce new sources of potential stormwater pollution, such as cleaning solvents, pesticides for landscaping, and petroleum products. Stormwater, including runoff from the proposed building and designated parking areas, could carry pollutants into public storm drains during operations. However, as the Project involves the adaptive reuse of an existing building on an already developed site, any impacts to surface and groundwater quality would be similar to existing conditions and impacts would be less than significant.

Alternative 1 would involve no construction nor operations activities on the Project Site. Accordingly, the Alternative 1 would have no impact with regard to water quality standards. As such, Alternative 1 would avoid the Project's less than significant hydrology and water quality impact. Thus, impacts related to water quality standards would be less under Alternative 1 than the Project.

HWQ-2) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

As discussed in **Section 4.8, Hydrology and Water Quality***,* of this Draft EIR, no water supply wells are located within or in the vicinity of the Project Site. Based on the relatively short-term and minimal construction-related water needs, and the diversified sources of the City's water supplies, construction-related water use would not substantially lower groundwater levels in the basin. The Project would adaptively reuse the existing building; therefore, the total amount of impervious surface under the Project would be similar to existing conditions. Furthermore, the Project Site is not located within a groundwater recharge area or facility, nor does it represent a source of groundwater recharge. Therefore, the Project would not substantially deplete groundwater supplies nor interfere substantially with groundwater recharge such that the Project would impede the basins' sustainable groundwater management, and impacts would be less than significant.

Alternative 1 would involve no construction nor operations activities that would alter the existing drainage pattern of the Project Site or surrounding area. Accordingly, Alternative 1 would have no impact with regard to existing drainage pattern of the site or area. As such, Alternative 1 would avoid the Project's less than significant impact. Thus, impacts related to water quality standards would be less under Alternative 1 than the Project.

HWQ-3a) Alter existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation on-or off-site.

As discussed in **Section 4.8, Hydrology and Water Quality** of this Draft EIR, upon completion of construction, the drainage pattern of the Project Site would be similar to existing conditions and runoff would continue to discharge to the existing storm drain and catch basin system to the north of the Project Site. The Project would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would result in substantial erosion or siltation on- or off-site. Furthermore, the Project would be required to prepare an erosion control plan and implement BMPs to minimize on-site and off-site erosion and siltation. Impacts would be less than significant.

Alternative 1 would involve no construction nor operations activities on the Project Site. Accordingly, Alternative 1 would have no impacts with regard to erosion. As such, Alternative 1 would avoid the Project's less than significant impact. Thus, impacts related to erosion would be less under Alternative 1 than the Project.

HWQ-3b) Alter existing drainage pattern of the site or area in a manner which would result in substantial flooding on- and off-site?

As discussed in **Section 4.8, Hydrology and Water Quality***,* of this Draft EIR, per the FEMA the Project Site is located within Zone X, which denotes an area with a minimal flood hazard. The Project involves the adaptive reuse of an existing building, upon completion of construction, the amount of impervious surface and drainage patterns of the Project Site would be similar to existing conditions. The Project would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would increase surface runoff that would result in flooding. Furthermore, the proposed drainage design would be reviewed and approved by the City to ensure that the Project does not result in increased flows off-site or otherwise significantly impact downstream drainage facilities. Accordingly, the Project would not cause additional flooding or substantial runoff, exceed the capacity of existing drainage facilities, or impede or redirect flood flows such that on-site or off-site areas are significantly impacted. Impacts would be less than significant.

Alternative 1 would involve no construction nor operations activities that would alter existing drainage patterns in a manner which would result in substantial flooding. Accordingly, Alternative 1 would have no impacts with regard to flooding. As such, Alternative 1 would avoid the Project's less than significant impact. Thus, impacts related to polluted runoff would be less under Alternative 1 than the Project.

HWQ-3c) alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff

As discussed in **Section 4.8, Hydrology and Water Quality** of this Draft EIR, upon completion of construction, the drainage pattern of the Project Site would be similar to existing conditions and runoff would continue to discharge to the existing storm drain and catch basin system to the north of the Project Site. The Project would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would result in substantial additional sources of polluted runoff.

Alternative 1 would not involve construction nor operations activities that would alter the existing drainage pattern or provide substantial additional sources of polluted runoff. Accordingly, Alternative 1 would have no impacts with regard to drainage systems or substantial additional sources of polluted runoff. As such, Alternative 1 would avoid the Project's less than significant impact and there would be no impact. Thus, impacts related to polluted runoff would be less under Alternative 1 than the Project.

HWQ-3d) Alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows.

As described in **Section 4.8, Hydrology and Water Quality**, of this Draft EIR upon completion of construction, the drainage pattern of the Project Site would be similar to existing conditions. The Project would not alter the course of a stream or a river and would not substantially increase impervious surface in a manner that would result in impediments to or redirection of flood flows. Any impacts would be less than significant.

Alternative 1 would involve no construction nor operations activities that would impede or redirect flood flows. Accordingly, Alternative 1 would have no impacts with regard to flood flows. As such, Alternative 1 would avoid the Project's less than significant impact, and there would be no impact. Thus, impacts related to the release of pollutants due to Project inundation would be less under Alternative 1 than the Project.

HWQ-5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

As described in **Section 4.8, Hydrology and Water Quality,** of this Draft EIR the Project is within the jurisdiction of the LA RWQCB Basin Plan, which identifies beneficial uses for surface water and groundwater and establishes water quality objectives to attain those beneficial uses, together known as water quality standards. The Project would not degrade water quality in a manner that would interfere with the beneficial uses of local surface water as established by the Basin Plan. The Project would comply with the City of Long Beach's Stormwater and Runoff Pollution Control Ordinance, as well as the current MS4 permit (NPDES Permit No. CAS004003). Furthermore, the Project Site is within the adjudicated Central Basin, and the Central Basin Judgment serves the same purpose as a groundwater management plan. Since the Project would be served by the City, who is in turn allocated a sustainable allotment of groundwater the Project would not conflict with the Judgment. Therefore, the Project would not conflict with or obstruct or obstruct water quality control plans, and impacts would be less than significant.

Alternative 1 would involve no construction nor operations activities that would conflict with or obstruct the implementation of water quality control plan or sustainable groundwater management plan. No impact would occur. As such, Alternative 1 would avoid the Project's less than significant impact. Thus, impacts related to the implementation of a water quality control plan or sustainable groundwater management plan would be less under Alternative 1 than the Project.

Land Use and Planning

As discussed in **Section 4.11, Land Use and Planning** within the Initial Study, included in **Appendix A**, the Project would not physically divide an established community; therefore, no impacts would occur.

LUP-2) Conflict with any land use plan, policy or regulation.

As described in **Section 4.9, Land use and Planning** of this Draft EIR the Project would not conflict with any land use plan, policy, or regulation. The Project proposes a General Plan Amendment/Map Change to change the existing land use designation of the Project Site from Community Commercial (CC) to Neighborhood Serving Center (NSC-Moderate). The Project also requires a Zoning Code change to modify the existing zone from Community Commercial Automobile-Oriented (CCA) to Mixed-Use (MU-3) to allow the Project's student residential uses and to enable the Project to take advantage of the adaptive reuse development standards. The Project would also require the approval of a Conditional Use Permit to allow the "Special Group Residence" and Site Plan review of adaptive reuse. Upon approval of the Project's entitlement by the City, the Project would not conflict with the City of Long Beach General Plan, including the City's Land Use Element, Housing Element, and Urban Design Element. Additionally, the Project would not conflict with the City's Zoning Ordinance and the SCAG 2024-20250 RTP/SCS. As such, the Project would not cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

Alternative 1 would involve no construction nor operations activities that would conflict with any land use plan, policy, or regulation. However, Alternative 1 would not address all the goals and policies outlined in the City of Long Beach General Plan. As outlined in the City's General Plan Housing Element, the City's RHNA allocation of housing between October 2021 and October 2029 has an objective of constructing 26,502 new units. Under Alternative 1, the existing development on the Project Site would remain as is and no new development would be implemented. Therefore, no new housing would be constructed in line with the City's RHNA allocation.

Furthermore, Alternative 1 would not be consistent with goals and policies outlined in the City's Housing Element, including Goal 4, Address the Unique Housing Needs of Special Needs Residents, which includes students. Alternative 1 would not construct housing; therefore, would not provide unique housing that would serve residents, including students. Nonetheless, Alternative 1 would have no impact on land use and therefore its impacts would be less than the Project.

Noise

NOI-1) Noise levels in excess of standards.

As discussed in **Section 4.10, Noise,** of this Draft EIR, noise impacts associated with Project construction and operations would not exceed applicable standards at noise sensitive receptor locations. Impacts are considered less than significant. Alternative 1 would involve no construction nor operations activities that would conflict with any noise standards. Accordingly, Alternative 1 would have no impacts with regard to noise. Thus, impacts related to noise would be less under Alternative 1 than the Project.

NOI-2) Excessive groundborne vibration or groundborne noise levels.

As discussed in **Section 4.10, Noise,** of this Draft EIR, construction activities at the Project Site would have the potential to generate groundborne vibration. However, Project construction-related vibration impacts would not exceed impact thresholds and impacts would be less than significant. Truck activity associated with Project operations would produce ground-borne vibration; however, vibration impacts would not exceed impact thresholds and impacts would be less than significant.

Alternative 1 would involve no construction or operations activities that would result in vibration impacts. As such, Alternative 1 would avoid the Project's less than significant vibration impacts to nearby vibration-sensitive receptor locations. Thus, impacts related to construction and operational vibration would be less under Alternative 1 than the Project.

NOI-3) Located in the vicinity of a private airstrips.

As discussed in **Section 4.10, Noise** of this Draft EIR, the Project Site is located within two miles of an airport or airstrip. The closest airport is Long Beach Airport located roughly 1.6 miles north of the Project Site. Review of the Long Beach Airport's Influence Area Map indicates the Project Site is outside of the Airport Influence Area (AIA) boundaries. Additionally, there are no other airports or airstrips within 2.0 miles of the Project Site. As such, the Project Site would not expose workers in the Project area to excessive noise levels from airport operations. Accordingly, there would be no impact.

Alternative 1 would involve no construction or operations activities. As such, Alternative 1 would not expose workers to excessive noise levels from airport operations and there would be no impact. Thus, impacts related to airport noise would be similar under Alternative 1 than the Project.

Population and Housing

As discussed in **Population and Housing** of the Initial Study, the Project would not displace substantial numbers of existing people or housing, therefore there would be no impact.

POP-1) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

As discussed in **Section 4.11, Population and Housing**, of this Draft EIR, the Project may result in direct population growth from future residents relocating to the City; however, the Project would not induce substantial unplanned population growth, exceeding regional population projections.

It is anticipated that construction workers and future employees of the Project would reside within the City and surrounding area, and commute to work. The Project would include the adaptive reuse of an existing office building to a student residential building and associated on-site improvements. The Project would not include components such as the extension of roads or existing infrastructure that would result in the indirect population growth within the City. Therefore, the Project would not induce substantial unplanned population growth and impacts would be less than significant.

Alternative 1 would involve no construction or operations activities that would induce substantial unplanned population growth. Accordingly, no impacts would occur. As such, Alternative 1 would avoid the Project's less than significant impact. Thus, impacts related to inducement of unplanned population growth would be less under Alternative 1 than the Project.

Public Services

PUB-1) Fire Protection?

PUB-2) Police Protection?

PUB-3) Schools?

PUB-4) Parks?

PUB-5) Other public facilities?

As discussed in the Initial Study included in **Appendix A** of this Draft EIR, the Project would have a less than significant impact in regard to Public Services. Three fire stations are located within 1 mile of the Project Site: LBFD Station 4 at 411 Loma Avenue LBFD Station 14 at 5200 East Elliot Street, and LBFD Station 17 at 2247 Argonne Avenue, located approximately 1.2 miles southwest, 0.95-mile south, and 1.2 miles southwest of the Project Site, respectively. Therefore, impacts associated with Fire Protection would be less than significant.

The City of Long Beach Police Department (LBPD) East Patrol Division Station is located at 3800 East Willow Street, approximately 1.5 miles northwest of the Project Site. All new residential and nonresidential developments would be required to comply with LBMC Section 18.15.060, Fire Facilities Impact Fee, and pay a Police Facilities Impact Fee to support a potential for an increase in need for police protection services. Impacts associated with police protection services would be less than significant.

The Project Site is within the boundaries of the Long Beach Unified School District (LBUSD). Under the provision of SB 50, school districts are authorized to collect fees to offset the costs associated with increasing school capacity as a result of development and related population increases; therefore, impacts associated with schools would be less than significant.

The closest park to the Project Site is the Los Altos Plaza Playground, located approximately 0.8 mile east of the Project Site. The Recreation Park Golf Course 18 is located 85 feet south of the Project Site. The Project would incorporate 22,523 sf of open space, which would include a student plaza, benches, lounging areas, pool, patio, outdoor BBQs and picnic tables, lawn area, shade structure, planters, and landscaping. Students residing on the Project Site would likely primarily utilize the amenities on-site or amenities on-campus. Additionally, the Project would be required to comply with LBMC Section 18.18.180, *Park Fee as Additional and Supplemental Requirements,* which requires that all residential and nonresidential development projects pay a proportionate share of the cost of providing park land and recreational improvements necessary

to meet the needs created by such development. Therefore, impacts related to new of physically altered governmental facilities would be less than significant.

The City of Long Beach Public Library operates twelve libraries throughout the City. The closest library to the Project Site is the Brewitt Neighborhood Library, located approximately 0.6-mile to the west of the Project Site. The introduction of new student residents could result in impacts to the provision of new of physically altered libraries. However, student residents would also have access to their own college libraries. Impacts related to public libraries would result in less than significant impacts.

Alternative 1 would involve no construction or operations activities that would require additional public services. Accordingly, no impacts would occur. As such, Alternative 1 would avoid the Project's less than significant impact. Thus, impacts related to public services would be less under Alternative 1 than the Project.

Recreation

REC-1) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

REC-2) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

As discussed in the Initial Study, included in **Appendix A,** of this Draft EIR, impacts to recreational facilities would have less than significant impacts. Students residing on the Project Site would likely primarily utilize the recreational amenities on-site or amenities on-campus. Furthermore, LBMC Section 18.18.180, Park Fee as Additional and Supplemental Requirements, requires that all residential and nonresidential development projects pay a proportionate share of the cost of providing park land and recreational improvements necessary to meet the needs created by such development. Therefore, the Project would be required to pay the park impact fee and impacts to recreational facilities would have a less than significant impact.

Alternative 1 would involve no operations activities that would require additional recreational amenities. Accordingly, no impacts would occur. As such, Alternative 1 would avoid the Project's less than significant impact. Thus, impacts related to recreation would be less under Alternative 1 than the Project.

Transportation

As discussed in the Initial Study included in **Appendix A**, of this Draft EIR, the Project would not substantially increase hazards due to geometric design features; therefore, it was determined to have no impact.

TRA-1) Conflict with programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities.

Project construction would potentially affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel closures. However, the Project would be required to develop a Traffic Management Plan (TMP) and comply with the Long Beach Department of Public Works.

The TMP would be required to be stamped and signed by a professional civil or traffic engineer, as part of the Project permit application. The TMP would limit any potential conflicts with transit. Furthermore, the Project would be required to comply with SCAG 2024-2050 RTP/SCS, City of Long Beach General Plan Mobility Element, and Bicycle Master Plan. Accordingly, Project construction would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities impacts would be less than significant.

Alternative 1 would involve no construction or operations activities that would involve any new development, and as such, would not conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, including those in the SCAG 2024-2050 RTP/SCS, City of Long Beach General Plan Mobility Element, and Bicycle Master Plan. Accordingly, Alternative 1 would have no impact and would avoid the Project's less than significant impact. Thus, impacts related to potential conflicts with any such programs, plans, ordinances, or policies would be less under Alternative 1 than the Project.

TRA-2) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

As discussed in Initial Study, included in **Appendix A** of this Draft EIR, the impacts related to VMT would be less than significant. Compared to the existing use, the Project is anticipated to generate 507 daily trips, 112 fewer trips during the weekday AM peak hour, and 3 trips during the weekday PM peak hour. The City of Long Beach Traffic Impact Analysis Guidelines (June 2020) states that a traffic impact study is generally required "for any project in Long Beach that is expected to generate 500 or more net new daily trips." Based on the City's traffic study guidelines, a traffic study would be needed if the Project generates more than 500 net daily trips. However, it should be noted that the Project generates less than 50 total net new peak hour trips (the City's threshold to analyze LOS at intersections). Therefore, a traffic impact study is not required for the Project. Impacts would be less than significant.

Alternative 1 would involve no construction or operations activities that would increase VMT. Accordingly, no impacts would occur. As such, Alternative 1 would avoid the Project's less than significant impact. Thus, impacts related to VMT would be less under Alternative 1 than the Project.

TRA-4) Result in inadequate emergency access?

As discussed in the Initial Study, included in Appendix A of this Draft EIR, impacts related to emergency access would be less than significant. Primary vehicular access to the Project Site would be provided via a two-way driveway from Clark Avenue at the Project Site's western boundary. Pedestrian access to the Project Site is provided via sidewalks located along Pacific Coast Highway, East Anaheim Street, and Clark Avenue. Project Site design, including automobile and pedestrian access would comply with the City's design standards and other requirements as established in the LBMC. The Project plans are subject to site and design review and the LBFD would review the site plan prior to the approval of permits for construction of the Project to ensure that adequate emergency access is provided. Accordingly, the Project would not result in inadequate emergency access and any impacts would be less than significant.

Alternative 1 would involve no construction or operations activities that would impact emergency access. Accordingly, no impacts would occur. As such, Alternative 1 would avoid the Project's

less than significant impact. Thus, impacts related to emergency access would be less under Alternative 1 than the Project.

Tribal Cultural Resources

TCR-1) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

As discussed in **Section 4.13, Tribal Cultural Resources,** of this Draft EIR, **Appendix C**, **Cultural Resources Assessment**, the existing buildings on the Project Site have been determined to not be eligible for listing in either the CRHR, or in a in a local register of historical resources. Therefore, there would be no impact to historical resources.

Alternative 1 would involve no construction or operations activities that would impact historical resources. Accordingly, no impacts would occur.

TRC-2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe

A search of the SLF was conducted through the NAHC to determine if any sacred lands or traditional cultural properties on file with the NAHC were within or near the Project Site. The NAHC's SLF record search was positive, indicating that there is record of sacred lands on the Project Site.[1] In compliance with AB 52, the City provided formal notification to California Native American tribal representatives identified by the NAHC. Native American groups may have knowledge about the area's cultural resources and may have concerns about a development's adverse effects on tribal cultural resources. AB 52 allows Tribes 30 days after receiving notification to request consultation. Of the tribes contacted, the City received one consultation request from the Gabrieleño Band of Mission Indians – Kizh Nation, who raised concerns over tribal cultural resources. Implementation of **Mitigation Measure TCR-1**, requiring a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation, would reduce potential impacts to tribal cultural resources to less than significant.

Alternative 1 would involve no construction or operations activities that would impact tribal cultural resources. As such, the City would not be required to initiate AB 52 tribal consultation. Therefore, Alternative 1 would avoid the Project's less than significant impacts and impacts would be less than the Project.

[1] Native American Heritage Commission. March 26, 2024. Native American Heritage Commission Letter and Native American Tribal Consultation List.

Utilities and Service Systems

UT-1) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities.

As discussed in **Section 4.14, Utilities and Service Systems,** of this Draft EIR, the Project would not require the construction of new water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities offsite. Therefore, impacts associated with both construction and operation of the Project would be less than significant.

Alternative 1 would involve no construction or operations activities that would involve the construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities offsite. Accordingly, Alternative 1 would have no impact and would avoid the Project's less than significant impact related to relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities. Thus, impacts related utilities and service systems would be less under Alternative 1 than the Project.

UT-2) Sufficient water supplies available to serve the project and reasonably foreseeable future development.

As discussed in **Section 4.14, Utilities and Services Systems**, there are sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, and impacts would be less than significant.

Alternative 1 would involve no construction or operational activities that would involve any new development, and thus would not result in increased water demand. Accordingly, Alternative 1 would have no impact and would avoid the Project's less than significant impact related to water supplies. Thus, impacts related to water supplies would be less under Alternative 1 than the Project.

UT-3) Wastewater provider inadequate capacity to serve projected demand.

As discussed in **Section 4.14, Utilities and Services Systems**, of this Draft EIR, the A.K Warren Water Resource Facility and Long Beach Water Reclamation Plant would have adequate capacity to treat the wastewater produced by Project operations. Furthermore, the Project would not require or result in the relocation or construction of new or expanded treatment facilities. Impacts related to wastewater generation would be less than significant.

Alternative 1 would involve no construction or operational activities that would involve any new development, and thus would not result in increased wastewater treatment. Accordingly, Alternative 1 would have no impact and would avoid the Project's less than significant impact related to wastewater treatment. Thus, impacts related to wastewater would be less under Alternative 1 than the Project.

UT-4) Generate solid waste in excess of State and local standards.

UT-5) Comply with federal, state, and local management, and reduction statues and regulations related to solid waste.

As discussed in **Section 4.14, Utilities and Service Systems**, of this Draft EIR, the Project would not generate solid waste in excess of State and local standards, or in excess of the capacity of

local infrastructure, and would comply with CALGreen, State regulations, and City regulations regarding solid waste management. Accordingly, any impacts would be less than significant.

Alternative 1 would involve no construction or operations activities that would involve any development and thus would not generate solid waste in excess of state and local standards. Accordingly, Alternative 1 would have no impact and would avoid the Project's less than significant impact related to solid waste. Thus, impacts related to solid waste would be less under Alternative 1 than the Project.

Relationship of the Alternative to the Project Objectives

As described above, Alternative 1 assumes that no new development would occur on the Project Site. The existing buildings would remain underutilized, similar to existing conditions. As Alternative 1 would not result in expanded student housing, Alternative 1 would not meet any of the objectives of the Project.

5.5.2 Alternative 2: Market Rate Housing

Description of the Alternative

Alternative 2 would adaptively reuse the existing building and develop market-rate housing. Alternative 2 would include 149 units, comprised of 65 one-bedroom, 44 two-bedroom, and 40 three-bedroom apartments, resulting in approximately 273 bedrooms total. Alternative 2 would generate 512 fewer trips than existing conditions. Under Alternative 2, the first floor would include amenities for the residents, including a laundry room, mailroom, loungeroom, and theatre. Outdoor amenities would include a dog park, outdoor BBQ with picnic tables, a flexible lawn with artificial turf, and an outdoor patio. An outdoor pool would be provided. The second to seventh floor would consist of residential units. Parking would be provided in the existing three levels of subterranean parking. Alternative 2 would be subject to AB 2097 parking requirements and would not enforce minimum parking requirements as the Project Site is located within one-half mile of public transit options including LBT bus service. Therefore, Alternative 2 would not be subject to parking minimums established by LBMC. Alternative 2 would provide 273 standard parking spaces for residents.

Environmental Impacts

Aesthetics

As discussed in **Section 4.1, Aesthetics**, of the Initial Study, included in **Appendix A**, of this Draft EIR, impacts to scenic vistas and scenic resources were determined to have no impact.

AES-3 If in a non-urbanized area, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings?

The Project is in a highly urbanized surrounded by developed office, residential, and commercial uses. Similar to the Project, Alternative 2 would require a General Plan Amendment from the current CC Placetype to the NSC-Moderate Placetype which would permit market rate housing. Alternative 2 would also require a Zoning Code Amendment/Map Change to change the existing zone from CCA to MU-3 to allow adaptive reuse development standards. Upon approval of the Zoning Amendment, Alternative 2 would be consistent with the development standards and regulations of the MU-3 Zoning District, including standards governing scenic quality, including building height, residential density, and FAR. Similar to the Project, Alternative 2 would comply with the required standards and other applicable local regulations pertaining to visual quality and would not conflict with applicable zoning and local regulations governing scenic quality and impacts on scenic quality would be less than significant. Thus, impacts with regard to visual character or quality of public views would be similar to the Project under Alternative 2.

AES-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Similar to the Project, Alternative 2 would include minor additions such as decorative window films, identification signage, a small pavilion building, improvements to the ground level entryways, and open space areas would not involve the use of highly reflective materials known to cause glare. However, while Alternative 2 would introduce new light sources related to new open space, amenity areas, and more active residential uses, lighting developed as part of Alternative 2 would be required to comply with LBMC Chapter 22.30.110, Lighting Design for Safety. As required, lighting is required to be directed and shielded to prevent light and glare from intruding onto adjacent sites, and light standards are not to exceed the building height and be appropriately spaced from adjacent

property lines. Therefore, Alternative 2 would not create new source of substantial light or glare which would adversely affect day or nighttime views and impacts would be less than significant. Thus, impacts related to glare would be similar to the Project under Alternative 2.

Air Quality

AQ-1) Conflict with or obstruct implementation of applicable air quality plan?

As discussed in **Section 4.2, Air Quality**, of this Draft EIR, the Project was evaluated for its potential to conflict with or obstruct implementation of an applicable air quality plan using the SCAQMD's 2022 AQMP, which establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving State and national air quality standards. As the Project would not generate localized construction or regional construction or operational emissions that would exceed SCAQMD thresholds of significance, the Project would not violate any air quality standards. Therefore, the Project would not conflict with or obstruct implementation of the applicable air quality plan, and impacts would be less than significant.

Similar to the Project, Alternative 2 would not conflict an applicable air quality plan using the SCAQMD's 2022 AQMP. Similar to the Project, Alternative 2 would not generate localized construction or regional construction or operational emissions that would exceed SCAQMD thresholds of significance and Alternative 2 would not violate any air quality standards. Therefore, Alternative 2 would not conflict with or obstruct implementation of the applicable air quality plan, and impacts would be less than significant. Therefore, impacts would be similar to the Project.

AQ-2) Cumulative increase in criteria pollutants/violation of air quality standards.

As discussed in **Section 4.2, Air Quality**, of this Draft EIR, Project construction emissions would be below SCAQMD's threshold for all criteria pollutants. Additionally, Project operational emissions would not exceed SCAQMD thresholds. Furthermore, construction and operational emissions would not result in a cumulative increase in criteria pollutants or a violation of air quality standards. Impacts to air quality associated with construction and operation of the Project would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Similar to the Project, under Alternative 2 an outdoor pool would be provided. Therefore, Alternative 2 would have similar construction impacts as the Project. Additionally, operational impacts to air quality under Alternative 2 would be less than the Project, due to fewer vehicle miles traveled. Compared to the Project's 507 net Project trips, Alternative 2 would generate 512 fewer trips than existing conditions (1,019 fewer trips than the Project). Therefore, Alternative 2 would not result in a cumulative increase in criteria pollutants and impacts would be less than significant. Thus, impacts under Alternative 2 would be less than the Project.

AQ-3 Expose sensitive receptors to substantial pollutant concentrations.

As discussed in **Section 4.2, Air Quality,** of this Draft EIR, the nearest sensitive receptors are the residences located approximately 170 feet (approximately 52 meters) to the west of the Project Site. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations and any impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Similar to the Project, the nearest sensitive receptors are the residences located approximately 170 feet (approximately 52 meters) to the west of the Project Site. Similar to the Project, an outdoor pool would be provided; therefore, Alternative 2 would have similar construction impacts to the Project. Additionally, operational impacts to air quality under Alternative 2 would be less than the Project,

due to fewer vehicle miles traveled. Compared to the Project's 507 net Project trips, Alternative 2 would generate 512 fewer trips than existing conditions (1,019 fewer trips than the Project). Accordingly, Alternative 2 would not result in increased exposure of sensitive receptors to pollutant concentrations, and impacts would be less than significant. Thus, impacts would be less under Alternative 2 than the Project.

AQ-4) Other emissions (such as those leading to odors).

As discussed in the Initial Study provided in **Appendix A** of this Draft EIR, the Project would have a less than significant impact related to odors. The Project is a residential building for students and does not propose to include any odor-inducing uses on the Project Site. Therefore, the Project would result in a less than significant impact related to other emissions leading to odors adversely affecting a substantial number of people.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Similar to the Project, Alternative 2 would be a residential building that does not propose to include any odor-inducing uses. Therefore, the Alternative 2 would result in a less than significant impact related to other emissions leading to odors. Thus, impacts would be similar to the Project under Alternative 2.

Biological Resources

As discussed in **Section 4.4, Biological Resources** of the Initial Study, included in **Appendix A** of this Draft EIR, impacts to the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan were determined to have no impact.

BIO-1) Adverse effect on any species identified as a candidate, sensitive, or special status species.

BIO-2) Adverse effect on any riparian habitat or other sensitive natural community

BIO-3) Adverse effect on state or federally protected wetlands

BIO-4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species.

BIO-5) Conflict with any local policies or ordinances protecting biological resources.

As discussed in the Initial Study, the Project would have a less than significant impact to biological resources and would not have an adverse effect on any candidate, sensitive, or special status species, riparian habitat or other sensitive natural community, federally protected wetlands, native resident or migratory fish and wildlife species, and conflict with any local policies or ordinances protecting biological resources. Therefore, impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Similar to the Project, Alternative 2 would not have an adverse effect on any species, riparian habitat, wetland, migratory species, or local policies or ordinances protecting biological resources. Accordingly, Alternative 2 would have less than significant impacts in regard to biological resources. Thus, impacts would be similar to the Project under Alternative 2.

Cultural Resources

As discussed in the Initial Study, impacts to historical resources pursuant to § 15064.5 were determined to have no impact.

CUL-2) Significance of an archaeological resource.

As discussed in **Section 4.3, Cultural Resources**, of this Draft EIR, the Cultural Resources Assessment prepared by BCR Consulting LLC on May 23, 2024 (see **Appendix C**) indicates the records search and field survey did not yield any cultural resources within the Project Site boundaries. The Project Site's conditions failed to indicate sensitively for buried archaeological resources due to the Project Site's severely disturbed state associated with excavation, grading, and construction of the existing office building. Construction activities for the Project would involve minimal demolition and excavation. However, earthwork activities could uncover previously known or unknown archaeological resources. Implementation of **Mitigation Measure CUL-1, Inadvertent Discovery of Cultural Resource**, would provide a process for treatment of any archaeological resources inadvertently discovered during Project implementation and would reduce impacts to archaeological resources to less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Similar to the Project, Alternative 2 would involve minimal demolition, however, construction activities could discover previously known or unknown historical or archaeological resources. Therefore, Alternative 2 would be less than significant with the implementation of **Mitigation Measure CUL-1, Inadvertent Discovery of Cultural Resource**. Thus, impacts would be similar to the Project under Alternative 2.

CUL-3) Disturbance of human remains.

As discussed in **Section 4.3, *Cultural Resources***, of this Draft EIR, the Cultural Resources Assessment prepared by BCR Consulting LLC (see **Appendix C**) indicates that the Project Site has a low potential for intact surface or subsurface human remains due to the level of previous development. However, it is possible that earthwork activities could uncover human remains were present within the Project area and were not recorded before or during development. Implementation of **Mitigation Measure CUL-2, Inadvertent Discovery of Human Remains**, would provide a process for treatment of any human remains inadvertently discovered during Project implementation, including requiring a cessation of construction activity until the County coroner can evaluate the discovery and make the necessary findings. With implementation of this mitigation measure, impacts to human remains would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Similar to the Project, an outdoor pool would be provided. Alternative 2 would involve minimal demolition, however, construction activities could discover previously unknown human remains. Therefore, Alternative 2 would result in a less than significant impact with mitigation with the implementation of **Mitigation Measure CUL-2, Inadvertent Discovery of Human Remains**. Thus, impacts would be similar under Alternative 2 when compared to the Project.

Energy

ENG-1) Wasteful, inefficient, or unnecessary consumption of energy resources.

As discussed in **Section 4.4, Energy** of this Draft EIR, construction and operation of the Project would not result in wasteful, inefficient, and unnecessary consumption of energy, and impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with149 new market rate units and a total of 273 beds. Although the Project would have the same number of units, there would be a smaller population, due to less bedrooms compared to the Project. However, the energy consumption during construction and operations of Alternative 2 would be negligible. Additionally, Alternative 2 would be required to comply with all energy efficiency requirements such as CALGreen code. Similar to the Project, Alternative 2 would not result in inefficient, wasteful, or unnecessary consumption of energy. Impacts with respect to energy consumption during construction and operations would be less than the Project.

ENG-2) Conflict with Plans for renewable energy or energy efficiency.

As discussed in **Section 4.4, Energy**, of this Draft EIR, the Project would support and promote the use of renewable energy and energy efficiency and would result in less than significant impacts. The Project would support Statewide and regional efforts to incorporate green building design features and improve energy efficiency in order to reduce wasteful or inefficient energy consumption; therefore, impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. As with the Project, Alternative 2 would comply with existing Statewide and regional efforts to incorporate green building design features and improve energy efficiency. Alternative 2 would have a less than significant impact regarding the provisions of plans for renewable energy and energy efficiency. Impacts under Alternative 2 would be similar to the Project.

Geology and Soils

As discussed in the Initial Study, the Project would have no impact to geology and soils, including: a rapture of a known earthquake fault; seismic-related ground failure, including liquefaction; landslides; potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse; expansive soil; and use of septic tanks or alternative wastewater.

GEO-1ii) Strong seismic ground shaking

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the Project Site would not directly or indirectly cause potential adverse effects involving seismic activity and impacts would be less than significant. The Project would involve the adaptive reuse of an existing office building. While the Project Site is located in the highly seismic Southern California region, development in the City is required to adhere to the California Building Standards Code (California Code of Regulations, Title 24) and the Uniform Building Code (UBC), as stated in LBMC Chapter 18.68, Earthquake Hazard Regulations. Therefore, the Project would not directly or indirectly cause potential adverse effects involving seismic ground shaking, and a less than significant impact would occur.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Similar to the Project, Alternative 2 would be located in the highly seismic Southern California region, where development in the City is required to adhere to the California Buildings Standards Code and the UBC, as stated in LBMC Chapter 18.68, Earthquake Hazard Regulations. Therefore, the

Alternative 2 would not directly or indirectly cause potential adverse effects involving seismic ground shaking, and a less than significant impact would occur. Thus, impacts related to strong seismic ground shaking would be similar to the Project under Alternative 2.

GEO 2) Result in substantial soil erosion or the loss of topsoil

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the Project would adaptively reuse an existing building and would require minimal grading and earthwork activities. Therefore, the Project would not result in substantial soil erosion or the loss of topsoil and there would be less than significant impacts.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Similar to the Project, Alternative 2 would not result in soil erosion or the loss of topsoil. Alternative 2 would have a less than significant impact related to soil erosion or loss of topsoil. Thus, impacts related to soil erosion or loss of topsoil would be similar to the Project under Alternative 2.

GEO-6) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

As discussed in **Section 4.5, Geology and Soils**, of this Draft EIR, the Project Site is in a highly urbanized environment that is fully developed. According to the Cultural Resources Assessment prepared by BCR Consulting LLC on May 23, 2024, the Project Site is underlain by old shallow marine deposits from the Pleistocene epoch, with surrounding units of Holocene epoch sediment. Pleistocene units. Excavation activities associated with the development of the Project Site would impact the paleontologically sensitive Pleistocene alluvia units. However, excavation of the Project Site would be minimal due to the adaptive reuse of the existing structure. With implementation of **Mitigation Measure GEO-1, Paleontological Monitoring**, and **Mitigation Measure GEO-2, Paleontological Documentation** impacts to paleontological resources would be less than significant.

Similar to the Project, Alternative 2 would require minimal construction due to the adaptive reuse of the existing structure. Alternative 2 would result in a less than significant impact to paleontological resources with the implementation of Mitigation Measure **GEO-1, Paleontological Monitoring** and **GEO-2, Paleontological Documentation**. Thus, impacts related to paleontological resources would be similar to the Project under Alternative 2.

Greenhouse Gas Emissions

GHG-1) Generation of GHG emissions.

As discussed in **Section 4.6, Greenhouse Gas Emission**, of this Draft EIR, the Project would generate GHG emissions due to construction and operational activities. The Project would generate approximately 817 $MTCO_2e$ annually from both construction and operations and would not exceed the SCAQMD's proposed GHG threshold of 3,000 $MTCO_2e$ per year. Therefore, impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Alternative 2 would have a similar construction schedule to the Project; therefore, GHG emissions during Project construction would be similar to the Project. With regards to operations, compared to the Project's 507 net trips, Alternative 2 would generate 512 fewer trips than existing conditions (1,019 fewer trips than the Project), which would generate lower GHG emissions during operations. Therefore, Alternative 2, with respect to GHG emission impacts would be less than the Project.

GHG-2) Conflict with applicable plans, policies, regulations, or recommendations.

As discussed in **Section 4.6, Greenhouse Gas Emissions,** of this Draft EIR, the Project would be consistent with Statewide, regional, and local plans, policies, regulations, and recommendations to reduce GHG emissions from development. Alternative 2, as with the Project would be consistent with the City of Long Beach Climate Action and Adaptation Plan, CALGreen, 2022 Electric Code, California Air Resource Board Scoping Plan Consistency, and 2020 RTP/SCS. Impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant under Alternative 2 and impacts would be similar to those of the Project.

Hazards and Hazardous Materials

As discussed in **Section 4,9, Hazards and Hazardous Materials** of the Initial Study, included in **Appendix A** of this Draft EIR, the Project Site would not be included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would not create a significant hazard to the public or the environment; therefore, there would be no impact related to hazardous materials.

HAZ-1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

As discussed in **Section 4.7, Hazards and Hazardous Materials**, of this Draft EIR, construction activities required for the Project would involve interior and pavement demolition, pool construction, interior renovation and construction, and architectural coating. However, compliance with CalOSHA standards, SCAQMD Rules, and the SWPPP would reduce impacts to less than significant. Similarly, Project operations would involve use of common chemicals; however, compliance with applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential to release contaminants. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. As with the Project, Alternative 2 would require interior renovation and construction and architectural coating. Alternative 2 would be required to comply with CalOSHA standards, SCAQMD Rules, and the SWPPP would reduce impacts to less than significant. Similarly, Project operations would involve use of common chemicals; however, compliance with applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential to release contaminants. Therefore, Alternative 2 would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts would be less than significant and similar to the Project.

HAZ-2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

As discussed in **Section 4.7, Hazards and Hazardous Materials**, of this Draft EIR, the Project Site is not located on a hazardous sites list compiled pursuant to California Government Code Section 65962.5. Furthermore, Project operations would likely involve uses employing common maintenance and janitorial supplies, such as solvents, paints, and thinners for Project Site maintenance, herbicides, and pesticides for landscaping, and other common chemicals.

Hazardous materials/chemicals such as cleaners, paints, solvents, and fertilizers in low quantities do not pose a significant threat related to the release of hazardous materials into the environment. Therefore, Project operations would not create a significant hazard to the public or the environment, and Project impacts during Project operations would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. As with the Project, Alternative 2 would use the same Project Site, which is not located on a hazardous sites list. As with the Project, Alternative 2 would likely involve the usage of common maintenance and janitorial supplies, such as solvents, paints, and thinners for Project Site maintenance, herbicides, and pesticides for landscaping, and other common chemicals. Therefore, impacts under Alternative 2 related to the accidental release of hazardous materials would be less than significant and similar to the Project.

HAZ-3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing proposed school.

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the closest school is the Woodrow Wilson High School, located approximately 0.45 mile southwest from the Project Site, at 4400 East 10th Street. No truck routes are located adjacent to Woodrow Wilson High School. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Similar to the Project, Alternative 2 would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant. Thus, impacts would be similar to the Project under Alternative 2.

HAZ-5) Located within an airport land use plan.

As discussed in **Section 4.7, Hazards and Hazardous Materials**, of this Draft EIR, the nearest airport to the Project site is the Long Beach Municipal Airport, located 1.60 miles to the north of the Project Site. Nevertheless, as explained in Section 4.10, Noise, review of the Project's AIA map indicates that the Project is located outside the AIA boundaries. Additionally, there are no other airports or airstrips within 2.0 miles of the Project Site. As such, although the Project is located within two miles of a public airport, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area.

Alternative 2 would use the same Project Site as the Project. Therefore, although Alternative 2 is located within two miles of a public airport, Alternative 2 would not result in a safety hazard or excessive noise for people residing or working in the Project area. Thus, impacts under Alternative 2 would be similar to the Project and would be less than significant.

HAZ-6) Interfere with an emergency response plan or emergency evacuation plan.

As discussed in **Section 4.7. Hazards and Hazardous Materials**, of the Draft EIR, the City's Natural Hazard Mitigation Plan was adopted in March 2023 and includes policies and programs to reduce the potential loss of life and property damage as a result of natural disasters. Project construction would not require the full or partial closure of roads. In addition, the Project would be reviewed by the LBFD to confirm that adequate emergency access for emergency vehicles is

provided. Therefore, the Project would not interfere within an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. As with the Project, Alternative 2 construction would not require the full or partial closure of roads. In addition, Alternative 2 would be reviewed by LBFD to confirm that adequate emergency access for emergency vehicles is provided. Therefore, Alternative 2 would not interfere with an adopted emergency response plan or emergency evacuation plan. Impacts under Alternative 2 related to emergency response plan or emergency excavation plans would be less than significant and would be similar to the Project.

HAZ-7) Expose people or structures to significant risk of loss, injury or death, involving wildfires.

As discussed in the Initial Study included in **Appendix A** of this Draft EIR the Project would not expose people or structures to a significant risk of loss, injury or death involving wildfires. The Project Site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) for the State Responsibility Area (SRA) or the Local Responsibility Area (LRA). Accordingly, the Project would not expose people or structures, either directly or indirectly, to a significance risk of loss, injury, or death involving wildland fires, and impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Similar to the Project, Alternative 2 would not expose people or structures to a significant risk of loss, injury or death involving wildfires. The Project Site is not located within VHFHSZ, SRA, or LRA. Alternative 2 would have less than significant impacts with regard to injury or death involving wildfires. Thus, impacts related to wildfires would be similar to the Project under Alternative 2.

Hydrology and Water Quality

As discussed in **Section 4.10, Hydrology and Water Quality** of the Initial Study, included in **Appendix A** of this Draft EIR, the Project Site would not be located in flood hazard, tsunami, or seiche zones, and risk the release of pollutants; therefore, impacts to flood hazards were determined to have no impact.

HWQ-1) Violate any water quality standards or waste discharge requirements or degrade surface or ground water quality.

As discussed in **Section 4.8, Hydrology and Water Quality**, of this Draft EIR construction activities associated with the development of the Project would require minimal excavation and grading, such activities may require the use of water for dust mitigation. Although the Project would require minimal excavation and grading, such activities may require the use of water for dust mitigation. Water from dust control and other liquids such as fuels, lubricants, and liquid wastes can create runoff that could temporarily affect water quality. However, such impacts to water quality would be temporary and would last only for the duration of the proposed construction activities. Implementation of the Project could introduce new sources of potential stormwater pollution, such as cleaning solvents, pesticides for landscaping, and petroleum products. Stormwater, including runoff from the proposed building and designated parking areas, could carry pollutants into public storm drains during operations. However, as the Project involves the adaptive reuse of an existing building on an already developed site, any impacts to surface and groundwater quality would be similar to existing conditions and impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Construction activities may require the use of water for dust mitigation. Water from dust control and other liquids such as fuels, lubricants, and liquid wastes can create runoff that could temporarily affect water quality. However, such impacts to water quality would be temporary and would last only for the duration of the proposed construction activities. Implementation of Alternative 2 could introduce new sources of potential stormwater pollution, such as cleaning solvents, pesticides for landscaping, and petroleum products. Stormwater, including runoff from the proposed building and designated parking areas, could carry pollutants into public storm drains during operations. However, as Alternative 2 involves the adaptive reuse of an existing building on an already developed site, any impacts to surface and groundwater quality would be similar to existing conditions and impacts would be less than significant and would be similar to the Project.

HWQ-2) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

As discussed in **Section 4.8, Hydrology and Water Quality**, of this Draft EIR, no water supply wells are located within or in the vicinity of the Project Site. Based on the relatively short-term and minimal construction-related water needs, and the diversified sources of the City's water supplies, construction-related water use would not substantially lower groundwater levels in the basin. The Project would adaptively reuse the existing building; therefore, the total amount of impervious surface under the Project would be similar to existing conditions. Furthermore, the Project Site is not located within a groundwater recharge area or facility, nor does it represent a source of groundwater recharge. Therefore, the Project would not substantially deplete groundwater supplies nor interfere substantially with groundwater recharge such that the Project would impede the basins' sustainable groundwater management, and impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. As with the Project, no water supply wells are located within or in the vicinity of the Project Site. Furthermore, the Project Site under Alternative 2 is not located within a groundwater recharge area or facility, nor does it represent a source of groundwater recharge. Therefore, Alternative 2 would not substantially deplete groundwater supplies nor interfere substantially with groundwater recharge such that Alternative 2 would impede the basins' sustainable groundwater management, and impacts would be less than significant and similar to the Project.

HWQ-3a) Alter existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation on-or off-site.

As discussed in **Section 4.8, Hydrology and Water Quality**, of this Draft EIR, upon completion of construction, the drainage pattern of the Project Site would be similar to existing conditions and runoff would continue to discharge to the existing storm drain and catch basin system to the north of the Project Site. The Project would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would result in substantial erosion or siltation on- or off-site. On-site runoff would be directed to on-site inlet structures, including catch basins to convey runoff to a stormwater treatment system. Furthermore, the Project would be required to prepare an erosion control plan and implement BMPs to minimize on-site and off-site erosion and siltation. Impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. As with the Project, Alternative 2 would not alter the course of a stream or a river and would not substantially increase impervious surface in a manner that would result in substantial erosion or siltation on-or-off-site. Furthermore, as with the Project, Alternative 2 would be required to prepare an erosion control plan and implement BMPs to minimize on-site and off-site erosion and siltation. Impacts

would be less than significant. Thus, impacts under Alternative 2 related to the existing drainage pattern would be similar to the Project.

HWQ-3b) Alter existing drainage pattern of the site or area in a manner which would result in substantial flooding on- and off-site?

As discussed in **Section 4.8, Hydrology and Water Quality**, of this Draft EIR, per the FEMA FIRMette the Project Site is located within Zone X, which denotes an area with a minimal flood hazard. The Project involves the adaptive reuse of an existing building, upon completion of construction, the amount of impervious surface and drainage patterns of the Project Site would be similar to existing conditions. The Project would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would increase surface runoff that would result in flooding. Impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. As with the Project, Alternative 2 would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would increase surface runoff that would result in flooding. Furthermore, as with the Project, the proposed drainage design under Alternative 2 would be reviewed and approved by the City. Thus, impacts related to flooding under Alternative 2 would be less than significant and would be similar to the Project.

HWQ-3c) Alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff

As discussed in **Section 4.8, Hydrology and Water Quality**, upon completion of construction, the drainage pattern of the Project Site would be similar to existing conditions and runoff would continue to discharge to the existing storm drain and catch basin system to the north of the Project Site. The Project would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would result in substantial additional sources of polluted runoff.

As with the Project, the drainage pattern of the Project Site under Alternative 2 would be similar to existing conditions and runoff would continue to discharge to the existing storm drain and catch basin system to the north of the Project Site. Alternative 2 would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would result in additional sources of polluted runoff. Thus, impacts under Alternative 2 related to polluted runoff would be less than significant and would be similar to the Project.

HWQ-3d) Alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows.

As described in **Section 4.8, Hydrology and Water Quality**, upon completion of construction, the drainage pattern of the Project Site would be similar to existing conditions. The Project would not alter the course of a stream or a river and would not substantially increase impervious surface in a manner that would result in impediments to or redirection of flood flows. Any impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. As with the Project, upon completion of Alternative 2, the drainage pattern of the Project Site would be similar to existing conditions. Furthermore, similar to the Project, Alternative 2 would not alter the course

of a stream or a river and would not substantially increase impervious surface in a manner that would result in impediments to or redirection of flood flows Impacts would be less than significant.. Thus, impacts under Alternative 2 related flood flows would be similar to the Project.

HWQ-5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

As described in **Section 4.8, Hydrology and Water Quality,** the Project is within the jurisdiction of the LA RWQCB Basin Plan, which identifies beneficial uses for surface water and groundwater and establishes water quality objectives to attain those beneficial uses, together known as water quality standards. The Project would not degrade water quality in a manner that would interfere with the beneficial uses of local surface water as established by the Basin Plan. The Project would comply with the City of Long Beach's Stormwater and Runoff Pollution Control Ordinance, as well as the current MS4 permit (NPDES Permit No. CAS004003). Furthermore, as described in Threshold HWQ-2, the Project Site is within the adjudicated Central Basin, and the Central Basin Judgment serves the same purpose as a groundwater management plan. Since the Project would be served by the City, who is in turn allocated a sustainable allotment of groundwater (i.e., the City's APA), the Project would not conflict with the Judgment. Therefore, the Project would not conflict with or obstruct or obstruct water quality control plans, and impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. As with the Project, Alternative 2 would not degrade water quality in a manner that would interfere with the groundwater management plan. Therefore, Alternative 2 would not conflict with or obstruct the implementation of water quality control plan or sustainable groundwater management plan and impacts would be less than significant. Thus, impacts under Alternative 2 related to the implementation of a water quality control plan or sustainable groundwater management plan would be similar to the Project.

Land Use and Planning

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the Project would not physically divide an established community; therefore, no impacts would occur.

LUP-2) Conflict with any land use plan, policy or regulation.

As described in **Section 4.9, Land use and Planning** of this Draft EIR the Project would not conflict with any land use plan, policy, or regulation. The Project proposes a General Plan Amendment/Map Change to change the existing land use designation of the Project Site from CC to NSC-Moderate. The Project also requires a Zoning Code change to modify the existing zone from CCA to Mixed-Use MU-3 to allow the Project's student residential uses and to enable the Project to take advantage of the adaptive reuse development standards. The Project would also require the approval of a Conditional Use Permit to allow the "Special Group Residence" and Site Plan review of adaptive reuse. Upon approval of entitlements by the City, the Project would not conflict with the City of Long Beach General Plan, including the City's Land Use Element, Housing Element, Urban Design Element. Additionally, the Project would not conflict with the City's Zoning Ordinance and the SCAG 2024-20250 RTP/SCS.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Similar to the Project, Alternative 2 would not conflict with any land use plan, policy, or regulation. Alternative 2 would require a General Plan Amendment from the current CC Placetype to the NSC-Moderate Placetype which would permit residential housing. Alternative 2 would also require a Zoning Code Amendment/Map Change to change the existing zone from CCA to Mixed-Use MU-3 to allow

adaptive reuse development standards. Therefore, Alternative 2 would not conflict with the City of Long Beach General Plan, including the City's Land Use Element, Housing Element, and Urban Design Element.

As described in **Section 4.11**, **Population and Housing,** of this Draft EIR growth forecasts contained in SCAG's 2024 RTP/SCS indicate that the number of households within the City will increase from 169,300 in 2019 to 197,300 in 2050, representing an increase of 28,000 households. Alternative 2 would include 149 units, which represents 0.5 percent of the anticipated increase for the City by 2050. Additionally, as outlined in the City's General Plan Housing Element, the City's RHNA allocation of housing between October 2021 and October 2029 has an objective of constructing 26,502 new units. The proposed 149 market rate housing units for Alternative 2 would represent approximately 0.6 percent of the number of new units planned to be constructed by the City per the Housing Element. Therefore, Alternative 2 would provide a similar number of units as the Project and would therefore reach the City's RHNA allocations to the same degree as the Project.

However, unlike the Project, Alternative 2 would not address all the goals and policies outlined in the City of Long Beach General Plan. Alternative 2 would not be consistent with goals and policies outlined in the City's Housing Element, including Goal 4, Address the Unique Housing Needs of Special Needs Residents. Alternative 2 would only construct market rate housing; therefore, would not provide unique housing that would serve special needs residents, including students. Impacts under Alternative 2 related to conflicts with any land use plan, policy, or regulation would be less than significant and similar to the Project.

Noise

NOI-1) Noise levels in excess of standards.

As discussed in **Section 4.10, Noise,** of this Draft EIR, noise impacts associated with Project construction would not exceed applicable standards at noise sensitive receptor locations. Operational noise would not exceed the applicable noise standards, and operational noise impacts are considered less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. As an adaptive reuse Project, Alternative 2 would utilize similar construction activities as the Project. Furthermore, Alternative 2 would result in similar levels of noise during Project construction as the Project. Alternative 2 would include the same number of dwelling units as the Project but would include fewer bedrooms and would generate 512 fewer trips than existing conditions (1,019 fewer trips than the Project). Therefore, Alternative 2 would have less than significant impacts with regards to noise. As such, impacts related to noise levels would be less than the Project.

NOI-2) Excessive groundborne vibration or groundborne noise levels.

As discussed in **Section 4.10, Noise,** of this Draft EIR, construction activities at the Project site would have the potential to generate groundborne vibration. However, Project construction-related vibration impacts would not exceed impact thresholds and impacts would be less than significant. Truck activity associated with Project operations would produce ground-borne vibration; however, vibration impacts would not exceed impact thresholds and impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Construction of Alternative 2 would involve similar construction activities and utilize similar equipment as under the Project. Therefore, impacts with regard to groundborne vibration would be less than significant and would be similar to the Project.

NOI-3) Located in the vicinity of a private airstrips.

As discussed in **Section 4.10, Noise** of this Draft EIR, the Project Site is located within two miles of an airport or airstrip. The closest airport is Long Beach Airport located roughly 1.6 miles north of the Project Site. Review of the Long Beach Airport's Influence Area Map indicates the Project Site is outside of the AIA boundaries. Additionally, there are no other airports or airstrips within 2.0 miles of the Project Site. As such, the Project Site would not expose workers in the Project area to excessive noise levels from airport operations. Accordingly, there would be no impact.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. The nearest airport is located roughly 1.6 miles north of the Project Site and is outside of the airport's AIA boundaries. As such, Alternative 2 would not expose workers to excessive noise levels from airport operations and there would be no impact. Thus, impacts related to airport noise would be similar under Alternative 2 than the Project.

Population and Housing

As discussed in the Initial Study, included in **Appendix A**, of this Draft EIR, the Project would not displace substantial numbers of existing people or housing, therefore, there would be no impact.

POP-1) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

As discussed in **Section 4.11, Population and Housing**, of this Draft EIR, the Project may result in direct population growth from future residents relocating to the City; however, the Project would not induce substantial unplanned population growth, exceeding regional population projections. Therefore, the Project would not induce substantial unplanned population growth and impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing and would provide 149 units for a total of 273 bedrooms. The population in the Project's proposed buildout year (2026) is estimated to be 474,099 persons. The anticipated population growth (273 bedrooms) under Alternative 2 would represent approximately 4.4 percent of the City's anticipated growth between 2019 and 2026, and approximately 1 percent of the City's anticipated growth between 2019 and 2050. The population growth under Alternative 2 would be less than the Project. Furthermore, the estimated population growth under Alternative 2 would be within regional growth projections for the City.

Growth forecasts contained in SCAG's 2024 RTP/SCS indicate that the number of households within the City will increase from 169,300 in 2019 to 197,300 in 2050, representing an increase of 28,000 households. Alternative 2 would include 149 units, which represents 0.5 percent of the anticipated increase for the City by 2050. Additionally, as outlined in the City's General Plan Housing Element, the City's RHNA allocation of housing between October 2021 and October 2029 has an objective of constructing 26,502 new units. The proposed 149 market rate housing units for Alternative 2 would represent approximately 0.6 percent of the number of new units planned to be constructed by the City per the Housing Element. Alternative 2 would provide the same number of units as the Project and would therefore reach the City's RHNA allocations to the same degree as the Project. Therefore, Alternative 2 would be consistent with SCAG's 2024 RTP/SCS, and would help the City reach it's RHNA goals to the same degree as the Project. Therefore, Alternative 2 would not induce substantial unplanned population growth, exceeding regional population projections. Similar to the Project, Alternative 2 would not include components such as the extension of roads or existing infrastructure that would result in the indirect population

growth within the City. Therefore, Alternative 2 would not induce substantial unplanned population growth and impacts would be less than significant and similar to the Project.

Public Services

PUB-1) Fire Protection?

PUB-2) Police Protection?

PUB-3) Schools?

PUB-4) Parks?

PUB-5) Other public facilities?

As discussed in **Section 4.15, Public Services**, of the Initial Study included in **Appendix A** of this Draft EIR, the Project would have a less than significant impact in regard to Public Services. Impacts to fire protection services, police protection services, schools, parks, and other public facilities would be less than significant.

Although Alternative 2 may result in direct population growth from future residents relocating to the City, Alternative 2 would not induce substantial unplanned population growth exceeding regional population projections which would substantially impact public services. Impacts to fire protection services, police protection services, schools, parks, and other public facilities would be less than significant and would be similar to the Project.

Recreation

REC-1) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

REC-2) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

As discussed in the Initial Study, included as **Appendix A** of this Draft EIR, impacts to recreational facilities would have less than significant impacts. Students residing on the Project Site would likely primarily utilize the recreational amenities on-site or amenities on-campus. Furthermore, LBMC Section 18.18.180, Park Fee as Additional and Supplemental Requirements, requires that all residential and nonresidential development projects pay a proportionate share of the cost of providing park land and recreational improvements necessary to meet the needs created by such development. Therefore, the Project would be required to pay the park impact fee. Therefore, impacts to recreational facilities would have a less than significant impact.

Alternative 2 would adaptively reuse the Project Site with new market rate housing and would provide 149 units comprised of 273 bedrooms total. Although Alternative 2 may result in direct population growth from future residents relocating to the City, Alternative 2 would not induce substantial unplanned population growth exceeding regional population projections which would substantially impact regional parks or other recreational facilities. Additionally, Alternative 2 would provide recreational space and amenities, including a pool, dog park, outdoor BBQ area with picnic tables, a flexible lawn with artificial turf, and an outdoor patio. Additionally, Alternative 2 would be required to adhere to LBMC Section 18. 18.180, Park Fee as Additional and Supplemental Requirements, and would be required to pay the park impact fee. Therefore,

impacts to Recreational amenities would be less than significant and would be similar to the Project.

Transportation

As discussed in the Initial Study, included in **Appendix A**, of this Draft EIR, the Project would not substantially increase hazards due to geometric design features; therefore, it was determined to have no impact.

TRA-1) Conflict with programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities.

As discussed in **Section 4.12, Transportation,** of this Draft EIR, Project construction would potentially affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel closures. However, the Project would be required to develop a Traffic Management Plan (TMP) and comply with the Long Beach Department of Public Works. The TMP would be required to be stamped and signed by a professional civil or traffic engineer, as part of the Project permit application. The TMP would limit any potential conflicts with transit. Furthermore, the Project would be required to comply with SCAG 2024-2050 RTP/SCS, City of Long Beach General Plan Mobility Element, and Bicycle Master Plan. Accordingly, Project construction would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities impacts would be less than significant.

Alternative 2 would adaptively reuse the Project site with new market rate housing. As the Project, Alternative 2 would be required to develop a TMP and comply with the Long Beach Department of Public Works. Furthermore, Alternative 2 would be required to comply with SCAG 2024-2050 RTP/SCS, City of Long Beach General Plan Mobility Element, and Bicycle Master Plan. Accordingly, Project construction would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities impacts would be less than significant and would be similar to the Project.

TRA-2) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

As discussed in the Initial Study, included in **Appendix A** of the Draft EIR, the impacts related to VMT would be less than significant. Compared to the existing use, the Project is anticipated to generate 507 daily trips, 112 fewer trips during the weekday AM peak hour, and 3 trips during the weekday PM peak hour. The City of Long Beach Traffic Impact Analysis Guidelines (June 2020) states that a traffic impact study is generally required "for any project in Long Beach that is expected to generate 500 or more net new daily trips." Based on the City's traffic study guidelines, a traffic study would be needed if the Project generates more than 500 net daily trips. However, it should be noted that the Project generates less than 50 total net new peak hour trips (the City's threshold to analyze LOS at intersections). Therefore, a traffic impact study is not required for the Project. Impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. Alternative 2 would generate 512 fewer trips than existing conditions (1,019 fewer trips than the Project). Under Alternative 2, there would be fewer trips compared to the Project; therefore, impacts would be

less than significant. Thus, impacts related to the VMT would be less under Alternative 2 than the Project.

TRA-4) Result in inadequate emergency access?

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, impacts related to emergency access would be less than significant. Primary vehicular access to the Project Site would be provided via a two-way driveway from Clark Avenue at the Project Site's western boundary. Pedestrian access to the Project Site is provided via sidewalks located along Pacific Coast Highway, East Anaheim Street, and Clark Avenue. Project Site design, including automobile and pedestrian access would comply with the City's design standards and other requirements as established in the LBMC. The Project plans are subject to site and design review and the LBFD would review the site plan prior to the approval of permits for construction of the Project to ensure that adequate emergency access is provided. Accordingly, the Project would not result in inadequate emergency access and any impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing and would not significantly impact emergency access. Similar to the Project, Alternative 2 would be accessible via a two-way driveway from Clark Avenue at the Project Site's western boundary. Pedestrian access to the Project Site is provided via sidewalks located along Pacific Coast Highway, East Anaheim Street, and Clark Avenue. Project Site design, including automobile and pedestrian access would comply with the City's design standards and other requirements as established in the LBMC and would avoid the Project's less than significant impact. Thus, impacts related to emergency access would be similar to the Project under Alternative 2.

Tribal Cultural Resources

TCR-1) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

As discussed in **Section 4.13, Tribal Cultural Resources,** of this Draft EIR, **Appendix C**, **Cultural Resources Assessment**, the existing buildings on the Project Site have been determined to not be eligible for listing in either the CRHR, or in a in a local register of historical resources. Therefore, there would be no impact to historical resources.

Alternative 2 would utilize the same Project Site as the Project. Thus, there would be no impact to historical resources under Alternative 2.

TRC-2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe

A search of the SLF was conducted through the NAHC to determine if any sacred lands or traditional cultural properties on file with the NAHC were within or near the Project Site. The NAHC's SLF record search was positive, indicating that there is record of sacred lands on the

Project Site.[2] In compliance with AB 52, the City provided formal notification to California Native American tribal representatives identified by the NAHC. Native American groups may have knowledge about the area's cultural resources and may have concerns about a development's adverse effects on tribal cultural resources. AB 52 allows Tribes 30 days after receiving notification to request consultation. Of the tribes contacted, the City received one consultation request from the Gabrieleño Band of Mission Indians – Kizh Nation, who raised concerns over tribal cultural resources. Implementation of **Mitigation Measure TCR-1**, requiring a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation, would reduce potential impacts to tribal cultural resources to less than significant.

Alternative 2 would adaptively reuse the Project Site with market rate housing. Similar to the Project, under Alternative 2, the City would be required to comply with AB 52 and initiate tribal consultation. Implementation of **Mitigation Measure TCR-1**, requiring a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation, would reduce potential impacts to tribal cultural resources to less than significant. Thus, impacts under Alternative 2 would be similar to the Project.

Utilities and Service Systems

UT-1) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities.

As discussed in **Section 4.14, Utilities and Service Systems,** of this Draft EIR, the Project would not require the construction of new water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities offsite. Therefore, impacts associated with both construction and operation of the Project would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. As the Project, Alternative 2 would not require the construction of new water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities offsite. Therefore, impacts associated with both construction and operation of the Project would be less than significant. Thus, impacts under Alternative 2 related to utilities and service systems would be similar to the Project.

UT-2) Sufficient water supplies available to serve the project and reasonably foreseeable future development.

As discussed in **Section 4.14, Utilities and Services Systems**, of this Draft EIR, LBUD has indicated that it would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, and impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. As the Project, LBUD would have sufficient water supplies available to serve Alternative 2 during normal, dry, and multiple dry years. Accordingly, Alternative 2 would have less than significant impact related to water supplies. Thus, impacts related to water supplies would be similar under the Alternative 2 than the Project.

[2] Native American Heritage Commission. March 26, 2024. Native American Heritage Commission Letter and Native American Tribal Consultation List.

UT-3) Wastewater provider inadequate capacity to serve projected demand.

As discussed in **Section 4.14, Utilities and Services Systems**, of this Draft EIR, the A.K Warren Water Resource Facility and Long Beach Water Reclamation Plant would have adequate capacity to treat the wastewater produced by Project operations. Furthermore, the Project would not require or result in the relocation or construction of new or expanded treatment facilities. Impacts related to wastewater generation would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. As the Project, Alternative 2 would not require or result in the relocation or construction of new or expanded treatment facilities. Therefore, impacts related to wastewater generation would be less than significant. Thus, impacts under Alternative 2 related to wastewater would be similar to the Project.

UT-4) Generate solid waste in excess of State and local standards.

UT-5) Comply with federal, state, and local management, and reduction statues and regulations related to solid waste.

As discussed in **Section 4.14, Utilities and Service Systems**, of this Draft EIR, the Project would not generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, and would comply with CALGreen, State regulations, and City regulations regarding solid waste management. Accordingly, any impacts would be less than significant.

Alternative 2 would adaptively reuse the Project Site with new market rate housing. As with the Project, Alternative 2 would not generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, and would comply with CALGreen, State regulations, and City regulations regarding solid waste management. Accordingly, any impacts would be less than significant. Thus, impacts related to solid waste would be similar under Alternative 2 than the Project.

Relationship of the Alternative to the Project Objectives

Alternative 2 consists of circumstances under which Alternative 2 would only provide market rate housing and not provide student housing on the Project Site. As such, Alternative 2 would not meet the following objectives to the same extent as under the Project and is, thus, considered to be only partially consistent with the following objectives:

- Provide a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design, including light materiality, landscape features, and active ground floor uses with open space amenities.
- Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions through such features as a PV solar panel array, electric vehicle charging stations, energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping.

Alternative 2 would not provide student housing as part of its development. Therefore, Alternative 2 would not meet the following objectives:

- Fulfill the City's housing goals by expanding student housing opportunities in proximity to open space, public transportation, and a wide range of services and goods.

- Promote sustainable development through the adaptive reuse of an existing seven-story office building into a 593-bed student housing development that includes supportive uses and amenities that promote interaction and communication between students such as large lounge areas and active outdoor recreational areas.
- Promote pedestrian and bicycle safety and access to the Project Site by engaging with the existing dedicated bike throughfare along Pacific Coast Highway with bicycle parking and lockers on the subterranean parking level 1.
- Increase access to alternative transportation options on the Project Site including zip cars and electric scooters. Increase accessibility to the Project Site through a dedicated ride share pick-up and drop-off locations along East Anaheim Street.
- Provide safe student housing through terraced landscape buffers and a security fence and gate.

5.5.3 Alternative 3: Senior Living and Student Housing

Description of the Alternative

Alternative 3 would adaptively reuse the existing building and develop senior and student housing. The first floor would provide an administrative office, an industrial kitchen, and medicine storage for the senior living residents. Additionally, a shared laundry room, a mailroom, a communal lounge, and a fitness room would be provided on the ground floor for the seniors and students. Outdoor amenities would include a residential gardening area, dining patio, and a flexible lawn with artificial turf. No outdoor pool would be provided. Senior housing would be provided on the second and third floors. Student housing would be provided on the fourth through seventh floor. Alternative 3 would provide 50 one-bedroom units for seniors and 395 beds for student housing. The student housing portion of Alternative 3 would be comprised of 125 one-bedroom, 75 two-bedroom, and 40 three-bedroom units, resulting in a total of 240 dwelling units with 395 beds overall for student housing. Each student housing floor would have its own shared lounge and kitchen. Additional amenities located on the student floors would include a fitness area and study rooms on the fourth through seventh floors. Alternative 3 would generate 103 net trips. There would be a total of 290 dwelling units. Alternative 3 would be subject to AB 2097 parking requirements as the site would be located within one-half mile of public transit options including LBT bus service. Therefore, Alternative 3 would provide 50 spaces for the senior living component (e.g., residents and employees) and would provide one parking spot per student resident (395 spaces). Therefore, Alternative 3 would provide a total of 445 parking spaces to serve the senior living uses and student housing.

Environmental Impacts

Aesthetics

As discussed in **Section 4.1, Aesthetics**, of the Initial Study, included in **Appendix A**, of this Draft EIR, impacts to scenic vistas and scenic resources were determined to have no impact.

AES-3 If in a non-urbanized area, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings?

The Project is in a highly urbanized surrounded by developed office, residential, and commercial uses. Similar to the Project, Alternative 3 would require a General Plan Amendment from the current CC Placetype to the NSC-Moderate Placetype which would permit housing. Alternative 3 would also require a Zoning Code Amendment/Map Change to change the existing zone from CCA to MU-3 to allow adaptive reuse development standards. Upon approval of the Zoning Amendment, Alternative 3 would be consistent with the development standards and regulations of the MU-3 Zoning District, including standards governing scenic quality, including building height, residential density, and FAR. Similar to the Project, Alternative 3 would comply with the required standards and other applicable local regulations pertaining to visual quality and would not conflict with applicable zoning and local regulations governing scenic quality and impacts on scenic quality would be less than significant. Thus, impacts with regard to visual character or quality of public views would be similar to the Project under Alternative 3.

AES-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views.

Alternative 3 would adaptively reuse the Project Site with student and senior housing. Similar to the Project, Alternative 2 would include minor additions such as decorative window films, identification signage, a small pavilion building, improvements to the ground level entryways, and

open space areas would not involve the use of highly reflective materials known to cause glare. However, while Alternative 2 would introduce new light sources related to new open space, amenity areas, and more active residential uses, lighting developed as part of Alternative 3 would be required to comply with LBMC Chapter 22.30.110, Lighting Design for Safety. As required, lighting is required to be directed and shielded to prevent light and glare from intruding onto adjacent sites, and light standards are not to exceed the building height and be appropriately spaced from adjacent property lines. Therefore, Alternative 3 would not create new source of substantial light or glare which would adversely affect day or nighttime views and impacts would be less than significant. Thus, impacts related to glare would be similar to the Project under Alternative 3.

Air Quality

AQ-1) Conflict with or obstruct implementation of applicable air quality plan?

As discussed in **Section 4.2, Air Quality**, of this Draft EIR, the Project was evaluated for its potential to conflict with or obstruct implementation of an applicable air quality plan using the SCAQMD's 2022 AQMP, which establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving State and national air quality standards. As the Project would not generate localized construction or regional construction or operational emissions that would exceed SCAQMD thresholds of significance, the Project would not violate any air quality standards. Therefore, the Project would not conflict with or obstruct implementation of the applicable air quality plan, and impacts would be less than significant.

Similar to the Project, Alternative 3 would not conflict an applicable air quality plan using the SCAQMD's 2022 AQMP. Similar to the Project, Alternative 3 would not generate localized construction or regional construction or operational emissions that would exceed SCAQMD thresholds of significance, and Alternative 3 would not violate any air quality standards. Therefore, Alternative 3 would not conflict with or obstruct implementation of the applicable air quality plan, and impacts would be less than significant. Therefore, impacts would be similar to the Project.

AQ-2) Cumulative increase in criteria pollutants/violation of air quality standards.

As discussed in **Section 4.2, Air Quality**, of this Draft EIR, Project construction emissions would be below SCAQMD's threshold for all criteria pollutants. Additionally, Project operational emissions would not exceed SCAQMD thresholds. Furthermore, construction and operational emissions would not result in a cumulative increase in criteria pollutants or a violation of air quality standards. Impacts to air quality associated with construction and operation of the Project would be less than significant.

Alternative 3 would adaptively reuse the Project Site with senior living facilities and student housing. However, no outdoor pool would be provided; therefore, Alternative 3 would have reduced construction impacts due to less construction equipment utilized as compared to the Project. Additionally, operational impacts to air quality under Alternative 3 would be less than the Project, due to the reduction in development and vehicle miles traveled. Compared to the Project's 507 net Project trips to existing conditions, Alternative 3 would generate 103 net trips to the existing conditions (404 fewer trips than the Project).Therefore, Alternative 3 would not result in a cumulative increase in criteria pollutants and impacts would be less than significant. Thus, impacts under Alternative 3 would be less than the Project.

AQ-3 Expose sensitive receptors to substantial pollutant concentrations.

As discussed in **Section 4.2, Air Quality,** of this Draft EIR, the nearest sensitive receptors are the residences located approximately 170 feet (approximately 52 meters) to the west of the Project Site. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations and any impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with new senior living facilities and student housing. Similar to the Project, the closest sensitive receptors would be located 170 feet west of the Project Site. Therefore, Alternative 3 would not expose sensitive receptors to substantial pollutant concentrations. Furthermore, Alternative 3 would have reduced construction impacts due to no pool which would result in less construction equipment utilized. Additionally, operational impacts to air quality under Alternative 3 would be less than the Project, due to the reduction in vehicle miles traveled. Compared to the Project's 507 net Project trips, Alternative 3 would generate 103 net trips to the existing conditions (404 fewer trips than the Project) Accordingly, Alternative 3 would not result in increased exposure of sensitive receptors to pollutant concentrations, and impacts would be less than significant Thus, impacts would be less under Alternative 3 than the Project.

AQ-4) Other emissions (such as those leading to odors).

As discussed in the Initial Study, provided in **Appendix A** of this Draft EIR, the Project would have a less than significant impact related to odors. The Project is a residential building for students and does not propose to include any odor-inducing uses on the Project Site. Therefore, the Project would result in a less than significant impact related to other emissions leading to odors adversely affecting a substantial number of people.

Alternative 3 would adaptively reuse the Project Site with new senior living facilities and student housing. Similar to the Project, Alternative 3 would be a residential building that does not propose to include any odor-inducing uses. Therefore, Alternative 3 would result in a less than significant impact related to other emissions leading to odors. Thus, impacts would be similar to the Project under Alternative 3.

Biological Resources

As discussed in **Section 4.4, Biological Resources** of the Initial Study, included in **Appendix A** of this Draft EIR, impacts to the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan were determined to have no impact.

BIO-1) Adverse effect on any species identified as a candidate, sensitive, or special status species.

BIO-2) Adverse effect on any riparian habitat or other sensitive natural community

BIO-3) Adverse effect on state or federally protected wetlands

BIO-4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species.

BIO-5) Conflict with any local policies or ordinances protecting biological resources.

As discussed in the Initial Study, the Project would have a less than significant impact to biological resources and would not have an adverse effect on any candidate, sensitive, or special status species, riparian habitat or other sensitive natural community, federally protected wetlands, native

resident or migratory fish and wildlife species, and conflict with any local policies or ordinances protecting biological resources. Therefore, impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with senior living facilities and student housing. Similar to the Project, Alternative 3 would not have an adverse effect on any species, riparian habitat, wetland, migratory species, or local policies or ordinances protecting biological resources. Accordingly, Alternative 3 would have a less than significant impact in regard to biological resources and impacts would be similar to the Project.

Cultural Resources

As discussed in the Initial Study, impacts to historical resources pursuant to § 15064.5 were determined to have no impact.

CUL-2) Significance of an archaeological resource.

As discussed in **Section 4.3, Cultural Resources**, of this Draft EIR, the Cultural Resources Assessment prepared by BCR Consulting LLC on May 23, 2024 (see **Appendix C**) indicates the records search and field survey conducted by BCR Consulting, LLC did not yield any cultural resources within the Project Site boundaries. The Project Site's conditions failed to indicate sensitively for buried archaeological resources due to the Project Site's severely disturbed state associated with excavation, grading, and construction of the existing office building. Construction activities for the Project would involve minimal demolition. Implementation of **Mitigation Measure CUL-1, Inadvertent Discovery of Cultural Resource**, would provide a process for treatment of any archaeological resources inadvertently discovered during Project implementation and would reduce impacts to archaeological resources to less than significant.

Alternative 3 would adaptively reuse the Project Site with senior living facilities and student housing. Furthermore, Alternative 3 would involve minimal construction as an adaptive reuse Project; therefore, implementation of **Mitigation Measure CUL-1, Inadvertent Discovery of Cultural Resource**, would provide a process for treatment of any archaeological resources inadvertently discovered during construction of the Project. As such, Alternative 3 would result in a less than significant impact with mitigation and impacts would be similar to the Project.

CUL-3) Disturbance of human remains.

As discussed in **Section 4.3, Cultural Resources**, of this Draft EIR, the Cultural Resources Assessment prepared by BCR Consulting LLC (see **Appendix C**) indicates that the Project Site has a low potential for intact surface or subsurface human remains due to the level of previous development. However, it is possible that construction activities could uncover human remains were present within the Project area and were not recorded before or during development. Implementation of **Mitigation Measure CUL-2, Inadvertent Discovery of Human Remains**, would provide a process for treatment of any human remains inadvertently discovered during Project implementation, including requiring a cessation of construction activity until the County coroner can evaluate the discovery and make the necessary findings. With implementation of this mitigation measure, impacts to human remains would be less than significant.

Alternative 3 would adaptively reuse the Project Site with senior living facilities and student housing. No outdoor pool would be provided; therefore, there would be less construction equipment and vibration associated with Alternative 3. Furthermore, as an adaptive reuse Project, Alternative 3 would involve construction. Implementation of **Mitigation Measure CUL-2, Inadvertent Discovery of Human Remains** would provide a process for treatment of any human

remains inadvertently discovered. Therefore, Alternative 3 would result in a less than significant impact with mitigation; impacts would be similar to the Project.

Energy

ENG-1) Wasteful, inefficient, or unnecessary consumption of energy resources.

As discussed in **Section 4.4, Energy** of this Draft EIR, construction and operation of the Project would not result in wasteful, inefficient, and unnecessary consumption of energy, and impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with senior living facilities and student housing. Compared to the Project, Alternative 3 would have less bedrooms and a smaller population which would reduce impacts related to energy consumption. Additionally, Alternative 3 would be required to comply with all energy efficiency requirements such as CALGreen code. Therefore, Alternative 3 would use less energy during both construction and operations than the Project. Furthermore, Alternative 3 would not result in inefficient, wasteful, or unnecessary consumption of energy. Impacts with respect to energy consumption during construction and operations would be less than significant and impacts would be less than the Project.

ENG-2) Conflict with Plans for renewable energy or energy efficiency.

As discussed in **Section 4.4, Energy**, of this Draft EIR, the Project would support and promote the use of renewable energy and energy efficiency and would result in less than significant impacts. The Project would support Statewide and regional efforts to incorporate green building design features and improve energy efficiency in order to reduce wasteful or inefficient energy consumption; therefore, impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with senior living facilities and student housing. As with the Project, Alternative 3 would comply with existing Statewide and regional efforts to incorporate green building design features and improve energy efficiency. Alternative 3 would have a less than significant impact regarding the provisions of plans for renewable energy and energy efficiency. Impacts under Alternative 3 would be similar to the Project.

Geology and Soils

As discussed in the Initial Study, included in Appendix A of this Draft EIR the Project would have no impact to geology and soils, including: a rapture of a known earthquake fault; seismic-related ground failure, including liquefaction; landslides; potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse; expansive soil; and use of septic tanks or alternative wastewater.

GEO-1ii) Strong seismic ground shaking

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the Project Site would not directly or indirectly cause potential adverse effects involving seismic activity and impacts would be less than significant. The Project would involve the adaptive reuse of an existing office building. While the Project Site is located in the highly seismic Southern California region, development in the City is required to adhere to the California Building Standards Code (California Code of Regulations, Title 24) and the Uniform Building Code (UBC), as stated in LBMC Chapter 18.68, Earthquake Hazard Regulations. Therefore, the Project would not directly or indirectly cause potential adverse effects involving seismic ground shaking, and a less than significant impact would occur.

Alternative 3 would adaptively reuse the Project Site with senior living facilities and student housing. Similar to the Project, Alternative 3 would be located in the highly seismic Southern California region, where development in the City is required to adhere to the California Building Standards Code and the UBC, as stated in LBMC Chapter 18.68, Earthquake Hazard Regulations. Therefore, Alternative 3 would not directly or indirectly cause potential adverse effects involving seismic ground shaking, and a less than significant impact would occur. Impacts would be similar to the Project under Alternative 3.

GEO 2) Result in substantial soil erosion or the loss of topsoil

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the Project would adaptively reuse an existing building and would require minimal grading and earthwork activities. Therefore, the Project would not result in substantial soil erosion or the loss of topsoil and there would be less than significant impacts.

Alternative 3 would adaptively reuse the Project Site with senior living facilities and student housing. Similar to the Project, Alternative 3 would not result in soil erosion or the loss of topsoil. Alternative 3 would have a less than significant impact related to soil erosion or loss of topsoil. Thus, impacts related to soil erosion or loss of topsoil would be similar to the Project under Alternative 3.

GEO-6) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

As discussed in **Section 4.5, Geology and Soils**, of this Draft EIR, the Project Site is in a highly urbanized environment that is fully developed. According to the Cultural Resources Assessment prepared by BCR Consulting LLC on May 23, 2024 (**Appendix C**), the Project Site is underlain by old shallow marine deposits from the Pleistocene epoch, with surrounding units of Holocene epoch sediment. Pleistocene units. Construction activities associated with the development of the Project Site would impact the paleontologically sensitive Pleistocene alluvia units. However, construction of the Project Site would be minimal due to the adaptive reuse of the existing structure. With implementation of **Mitigation Measure GEO-1, Paleontological Monitoring**, and **Mitigation Measure GEO-2, Paleontological Documentation** impacts to paleontological resources would be less than significant.

Similar to the Project, excavation under Alternative 3 would be minimal due to the adaptive reuse of the existing structure. No outdoor pool would be provided under Alternative 3 therefore, there would be less construction equipment associated with Alternative 3. With the implementation of **Mitigation Measure GEO-1, Paleontological Monitoring** and **GEO-2, Paleontological Documentation**, impacts to paleontological resources would be less than significant and impacts related to paleontological resources would be similar to the Project.

Greenhouse Gas Emissions

GHG-1) Generation of GHG emissions.

As discussed in **Section 4.6, Greenhouse Gas Emission**, of this Draft EIR, the Project would generate GHG emissions due to construction and operational activities. The Project would generate approximately 817 $MTCO_2e$ annually from both construction and operations and would not exceed the SCAQMD's proposed GHG threshold of 3,000 $MTCO_2e$ per year. Therefore, impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with senior living facilities and student housing. Unlike the Project, Alternative 3 would not incorporate an outdoor pool, therefore there

would be less construction equipment associated with Alternative 3. Similar to the Project, there would be minimal construction due to the adaptive reuse of the existing structure. Therefore, there would be less development associated with Alternative 3, which would result in lower emissions than the Project. Furthermore, Alternative 3 would include a fewer number of bedrooms than the Project, which would result in lower GHG emissions than the Project. Compared to the Project's 507 net trips, Alternative 3 would generate 103 net trips (404 fewer trips than the Project), which would generate lower GHG emissions during operations. Therefore, Alternative 3, with respect to GHG emissions would be less than the Project.

GHG-2) Conflict with applicable plans, policies, regulations, or recommendations.

As discussed in **Section 4.6, Greenhouse Gas Emissions,** of this Draft EIR, the Project would be consistent with Statewide, regional, and local plans, policies, regulations, and recommendations to reduce GHG emissions from development. Alternative 3, as with the Project would be consistent with the City of Long Beach Climate Action and Adaptation Plan, CALGreen, 2022 Electric Code, California Air Resource Board Scoping Plan Consistency, and 2020 RTP/SCS. Impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant under Alternative 3 and impacts would be similar to those of the Project.

Hazards and Hazardous Materials

As discussed in **Section 4,9, Hazards and Hazardous Materials** of the Initial Study, included in **Appendix A** of this Draft EIR, the Project Site would not be included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would not create a significant hazard to the public or the environment. Impacts related to the hazardous materials within one-mile of a school were found to be less than significant. Furthermore, the Project Site was not included on a list of hazardous materials, pursuant to Government Code § 65962.5, and therefore, would have no impact related to a significant hazard to the public or the environment.

HAZ-1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

As discussed in **Section 4.7, Hazards and Hazardous Materials**, of this Draft EIR, construction activities required for the Project would involve interior and pavement demolition, pool construction, interior renovation and construction, and architectural coating. However, compliance with CalOSHA standards, SCAQMD Rules, and the SWPPP would reduce impacts to less than significant. Similarly, Project operations would involve use of common chemicals; however, compliance with applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential to release contaminants. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. As with the Project, Alternative 3 would require interior renovation and construction and architectural coating. Similar to the Project, Alternative 3 would be required to comply with CalOSHA standards, SCAQMD Rules, and the SWPPP would reduce impacts to less than significant. Similarly, Project operations would involve use of common chemicals; however, compliance with applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential to release contaminants. Therefore, Alternative 3 would not create a significant hazard to the public or the environment

through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Thus, impacts under Alternative 3 would be similar to the Project.

HAZ-2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

As discussed in **Section 4.7, Hazards and Hazardous Materials**, of this Draft EIR, the Project Site is not located on a hazardous sites list compiled pursuant to California Government Code Section 65962.5. Furthermore, Project operations would likely involve uses employing common maintenance and janitorial supplies, such as solvents, paints, and thinners for Project Site maintenance, herbicides, and pesticides for landscaping, and other common chemicals. Hazardous materials/chemicals such as cleaners, paints, solvents, and fertilizers in low quantities do not pose a significant threat related to the release of hazardous materials into the environment. Therefore, Project operations would not create a significant hazard to the public or the environment, and Project impacts during Project operations would be less than significant.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. As with the Project, Alternative 3 would use the same Project Site, which is not located on a hazardous sites list. As with the Project, Alternative 3 would likely involve uses employing common maintenance and janitorial supplies, such as solvents, paints, and thinners for Project Site maintenance, herbicides, and pesticides for landscaping, and other common chemicals. Therefore, impacts under Alternative 3 related to the accidental release of hazardous materials would be less than significant and similar to the Project.

HAZ-3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing proposed school.

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the closest school is the Woodrow Wilson High School, located approximately 0.45 mile southwest from the Project Site, at 4400 East 10th Street. No truck routes are located adjacent to Woodrow Wilson High School. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. Similar to the Project, Alternative 3 would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant. Thus, impacts would be similar to the Project under Alternative 3.

HAZ-5) Located within an airport land use plan.

As discussed in **Section 4.7, Hazards and Hazardous Materials**, of this Draft EIR, the nearest airport to the Project Site is the Long Beach Municipal Airport, located 1.60 miles to the north of the Project Site. Nevertheless, as explained in **Section 4.10, Noise**, of this Draft EIR, review of the Project's AIA map indicates that the Project is located outside the AIA boundaries. Additionally, there are no other airports or airstrips within 2.0 miles of the Project Site. As such, although the Project is located within two miles of a public airport, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area.

Alternative 3 would use the same Project Site as the Project. Therefore, although Alternative 3 would be located within two miles of a public airport, Alternative 3 would not result in a safety hazard or excessive noise for people residing or working in the Project area. Therefore, impacts under Alternative 3 would be less than significant and would be similar to the Project.

HAZ-6) Interfere with an emergency response plan or emergency evacuation plan.

As discussed in **Section 4.7. Hazards and Hazardous Materials**, of the Draft EIR, the City's Natural Hazard Mitigation Plan was adopted in March 2023 and includes policies and programs to reduce the potential loss of life and property damage as a result of natural disasters. Project construction would not require the full or partial closure of roads. In addition, the Project would be reviewed by the LBFD to confirm that adequate emergency access for emergency vehicles is provided. Therefore, the Project would not interfere within an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with senior living facility and student housing. As with the Project, Alternative 3 construction would not require the full or partial closure of roads. In addition, Alternative 3 would be reviewed by LBFD to confirm that adequate emergency access for emergency vehicles is provided. Therefore, Alternative 3 would not interfere with an adopted emergency response plan or emergency evacuation plan. Impacts under Alternative 3 related to emergency response plan or emergency excavation plans would be less than significant and would be similar to the Project.

HAZ-7) Expose people or structures to significant risk of loss, injury or death, involving wildfires.

As discussed in the Initial Study included in **Appendix A** of this Draft EIR the Project would not expose people or structures to a significant risk of loss, injury or death involving wildfires. The Project Site is not located within a VHFHSZ or a SRA or LRA. Accordingly, the Project would not expose people or structures, either directly or indirectly, to a significance risk of loss, injury, or death involving wildland fires, and impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with senior living facilities and student housing. Similar to the Project, Alternative 3 would not expose people or structures to a significant risk of loss, injury or death involving wildfires. The Project Site is not located within a VHFHSZ, SRA, or LRA. Alternative 3 would have less than significant impacts with regard to injury or death involving wildfires. Thus, impacts related to wildfires would be similar to the Project under Alternative 3.

Hydrology and Water Quality

As discussed in **Section 4.10, Hydrology and Water Quality** of the Initial Study, included in **Appendix A** of this Draft EIR, the Project Site would not be located in flood hazard, tsunami, or seiche zones, and risk the release of pollutants; therefore, impacts to flood hazards were determined to have no impact.

HWQ-1) Violate any water quality standards or waste discharge requirements or degrade surface or ground water quality.

As discussed in **Section 4.8, Hydrology and Water Quality**, of this Draft EIR construction activities associated with the development of the Project would require minimal excavation and grading, such activities may require the use of water for dust mitigation. Although the Project would require minimal excavation and grading, such activities may require the use of water for dust mitigation. Water from dust control and other liquids such as fuels, lubricants, and liquid

wastes can create runoff that could temporarily affect water quality. However, such impacts to water quality would be temporary and would last only for the duration of the proposed construction activities. Implementation of the Project could introduce new sources of potential stormwater pollution, such as cleaning solvents, pesticides for landscaping, and petroleum products. Stormwater, including runoff from the proposed building and designated parking areas, could carry pollutants into public storm drains during operations. However, as the Project involves the adaptive reuse of an existing building on an already developed site, any impacts to surface and groundwater quality would be similar to existing conditions and impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with senior living facilities and student housing. Although Alternative 3 would not require excavation and grading, construction activities may require the use of water for dust mitigation. Water from dust control and other liquids such as fuels, lubricants, and liquid wastes can create runoff that could temporarily affect water quality. However, such impacts to water quality would be temporary and would last only for the duration of the proposed construction activities. Implementation of Alternative 3 could introduce new sources of potential stormwater pollution, such as cleaning solvents, pesticides for landscaping, and petroleum products. Stormwater, including runoff from the proposed building and designated parking areas, could carry pollutants into public storm drains during operations. As Alternative 3 involves the adaptive reuse of an existing building on an already developed site, any impacts to surface and groundwater quality would be similar to existing conditions and impacts would be less than significant and would be similar to the Project.

HWQ-2) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

As discussed in **Section 4.8, Hydrology and Water Quality**, of this Draft EIR, no water supply wells are located within or in the vicinity of the Project Site. Based on the relatively short-term and minimal construction-related water needs, and the diversified sources of the City's water supplies, construction-related water use would not substantially lower groundwater levels in the basin. The Project would adaptively reuse the existing building; therefore, the total amount of impervious surface under the Project would be similar to existing conditions. Furthermore, the Project Site is not located within a groundwater recharge area or facility, nor does it represent a source of groundwater recharge. Therefore, the Project would not substantially deplete groundwater supplies nor interfere substantially with groundwater recharge such that the Project would impede the basins' sustainable groundwater management, and impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with senior living facilities and student housing. As with the Project, no water supply wells are located within or in the vicinity of the Project Site. Furthermore, the Project Site under Alternative 3 is not located within a groundwater recharge area or facility, nor does it represent a source of groundwater recharge. Therefore, Alternative 3 would not substantially deplete groundwater supplies nor interfere substantially with groundwater recharge such that Alternative 3 would impede the basins' sustainable groundwater management, and impacts would be less than significant and similar to the Project.

HWQ-3a) Alter existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation on-or off-site.

As discussed in **Section 4.8, Hydrology and Water Quality**, of this Draft EIR, upon completion of construction, the drainage pattern of the Project Site would be similar to existing conditions and runoff would continue to discharge to the existing storm drain and catch basin system to the north of the Project Site. The Project would not alter the course of a stream or river and would not

substantially increase impervious surface in a manner that would result in substantial erosion or siltation on- or off-site. On-site runoff would be directed to on-site inlet structures, including catch basins to convey runoff to a stormwater treatment system. Furthermore, the Project would be required to prepare an erosion control plan and implement BMPs to minimize on-site and off-site erosion and siltation. Impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with senior living facilities and student housing. As with the Project, Alternative 3 would not alter the course of a stream or a river and would not substantially increase impervious surface in a manner that would result in substantial erosion or siltation on-or-off-site. Furthermore, as with the Project, Alternative 3 would be required to prepare an erosion control plan and implement BMPs to minimize on-site and off-site erosion and siltation. Impacts would be less than significant. Thus, impacts under Alternative 3 related to the existing drainage pattern would be similar to the Project.

HWQ-3b) Alter existing drainage pattern of the site or area in a manner which would result in substantial flooding on- and off-site?

As discussed in **Section 4.8, Hydrology and Water Quality***,* of this Draft EIR, per the FEMA FIRMette the Project Site is located within Zone X, which denotes an area with a minimal flood hazard. The Project involves the adaptive reuse of an existing building, upon completion of construction, the amount of impervious surface and drainage patterns of the Project Site would be similar to existing conditions. The Project would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would increase surface runoff that would result in flooding. Impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with senior living facilities and student housing. As with the Project, Alternative 3 would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would increase surface runoff that would result in flooding. Furthermore, as with the Project, the proposed drainage design under Alternative 3 would be reviewed and approved by the City. Thus, impacts related to flooding under Alternative 3 would be less than significant. Thus, impacts under Alternative 3 related to flooding would be similar to the Project.

HWQ-3c) alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff

As discussed in **Section 4.8, Hydrology and Water Quality***,* upon completion of construction, the drainage pattern of the Project Site would be similar to existing conditions and runoff would continue to discharge to the existing storm drain and catch basin system to the north of the Project Site. The Project would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would result in substantial additional sources of polluted runoff.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. As with the Project, the drainage pattern of the Project Site under Alternative 3 would be similar to existing conditions and runoff would continue to discharge to the existing storm drain and catch basin system to the north of the Project Site. Alternative 3 would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would result in additional sources of polluted runoff. Thus, impacts under Alternative 3 related to polluted runoff would be less than significant and would be similar to the Project.

HWQ-3d) Alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows.

As described in **Section 4.8, Hydrology and Water Quality**, upon completion of construction, the drainage pattern of the Project Site would be similar to existing conditions. The Project would not alter the course of a stream or a river and would not substantially increase impervious surface in a manner that would result in impediments to or redirection of flood flows. Any impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. As with the Project, upon completion of Alternative 3, the drainage pattern of the Project Site would be similar to existing conditions. Furthermore, Alternative 3 would not alter the course of a stream or a river and would not substantially increase impervious surface in a manner that would result in impediments to or redirection of flood flows. As such, Alternative 3 would avoid the Project's less than significant impact. Thus, impacts under Alternative 3 related to flood flows would be similar to the Project.

HWQ-5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

As described in **Section 4.8, Hydrology and Water Quality,** the Project is within the jurisdiction of the LA RWQCB Basin Plan, which identifies beneficial uses for surface water and groundwater and establishes water quality objectives to attain those beneficial uses, together known as water quality standards. The Project would not degrade water quality in a manner that would interfere with the beneficial uses of local surface water as established by the Basin Plan. The Project would comply with the City of Long Beach's Stormwater and Runoff Pollution Control Ordinance, as well as the current MS4 permit (NPDES Permit No. CAS004003). Furthermore, as described in Threshold HWQ-2, the Project Site is within the adjudicated Central Basin, and the Central Basin Judgment serves the same purpose as a groundwater management plan. Since the Project would be served by the City, who is in turn allocated a sustainable allotment of groundwater (i.e., the City's APA), the Project would not conflict with the Judgment. Therefore, the Project would not conflict with or obstruct or obstruct water quality control plans, and impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. As with the Project, Alternative 3 would not degrade water quality in a manner that would interfere with the groundwater management plan. Therefore, Alternative 3 would not conflict with or obstruct the implementation of water quality control plan or sustainable groundwater management plan and impacts would be less than significant. Thus, impacts under Alternative 3 related to the implementation of a water quality control plan or sustainable groundwater management plan would be similar to the Project.

Land Use and Planning

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the Project would not physically divide an established community; therefore, no impacts would occur.

LUP-2) Conflict with any land use plan, policy or regulation.

As described in **Section 4.9, Land use and Planning** of this Draft EIR the Project would not conflict with any land use plan, policy, or regulation. The Project proposes a General Plan Amendment/Map Change to change the existing land use designation of the Project Site from CC

to NSC-Moderate. The Project also requires a Zoning Code change to modify the existing zone from CCA to Mixed-Use MU-3 to allow the Project's student residential uses and to enable the Project to take advantage of the adaptive reuse development standards. The Project would also require the approval of a Conditional Use Permit to allow the "Special Group Residence" and Site Plan review of adaptive reuse. Upon approval of entitlements by the City, the Project would not conflict with the City of Long Beach General Plan, including the City's Land Use Element, Housing Element, Urban Design Element. Additionally, the Project would not conflict with the City's Zoning Ordinance and the SCAG 2024-20250 RTP/SCS.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. Similar to the Project, Alternative 3 would not conflict with any land use plan, policy, or regulation. Alternative 3 would require a General Plan Amendment from the current CC Placetype to the NSC-Moderate Placetype which would permit residential housing. Alternative 3 would also require a Zoning Code Amendment/Map Change to change the existing zone from CCA to Mixed-Use MU-3 to allow a Special Group Residence and adaptive reuse development standards. Therefore, Alternative 3 would not conflict with the City of Long Beach General Plan, including the City's Land Use Element, Housing Element, and Urban Design Element.

As described in **Section 4.11**, **Population and Housing,** of this Draft EIR growth forecasts contained in SCAG's 2024 RTP/SCS indicate that the number of households within the City will increase from 169,300 in 2019 to 197,300 in 2050, representing an increase of 28,000 households. Alternative 3 would include 50 units for seniors and 125 one-bedroom, 75 two-bedroom, and 40 three-bedroom units for student housing, resulting in a total of 240 dwelling units with 395 beds overall for student housing. Alternative 3 would provide a total of 290 units which would represents 1 percent of the anticipated increase for the City by 2050. Additionally, as outlined in the City's General Plan Housing Element, the City's RHNA allocation of housing between October 2021 and October 2029 has an objective of constructing 26,502 new units. The proposed 290 units for Alternative 3 would represent approximately 1 percent of the number of new units planned to be constructed by the City per the Housing Element. Therefore, Alternative 3 would provide more dwelling units than the Project. As such, Alternative 3 would be consistent with SCAG's 2024 RTP/SCS, and would help the City reach it's RHNA goals quicker than the Project.

As with the Project, Alternative 3 would be generally consistent with the goals and policies outlined in the City of Long Beach General Plan. Alternative 3 would be consistent with the goals and policies outlined in the City's Housing Element, including Goal 4, Address the Unique Housing Needs of Special Needs Residents by providing senior living facilities and student housing. Impacts under Alternative 3 related to conflicts with any land use plan, policy, or regulation would be similar to the Project.

Noise

NOI-1) Noise levels in excess of standards.

As discussed in **Section 4.10, Noise,** of this Draft EIR, noise impacts associated with Project construction would not exceed applicable standards at noise sensitive receptor locations. Operational noise would not exceed the applicable noise standards, and operational noise impacts are considered less than significant.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. Alternative 3 would not have an outdoor pool; therefore it would require less equipment and result in less vibration. Therefore, as Alternative 3 would utilize less construction equipment compared to the Project, impacts would be less than those of the Project. Additionally, Alternative

3 would provide a fewer number of beds which would generate 103 net trips (404 fewer trips than the Project). Therefore, Alternative 3 would have less than significant impacts with regards to noise. As such, impacts related to noise levels would be less than the Project.

NOI-2) Excessive groundborne vibration or groundborne noise levels.

As discussed in **Section 4.10, Noise,** of this Draft EIR, construction activities at the Project Site would have the potential to generate groundborne vibration. However, Project construction-related vibration impacts would not exceed impact thresholds and impacts would be less than significant. Truck activity associated with Project operations would produce ground-borne vibration; however, vibration impacts would not exceed impact thresholds and impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. Alternative 3 would not include an outdoor pool; therefore there would be less construction equipment and vibration compared to the Project. Therefore, while construction of Alternative 3 would involve similar construction activities, there would be less equipment and vibration. Alternative 3 would be less than significant impact and impacts would be less than those of the Project.

NOI-3) Located in the vicinity of a private airstrips.

As discussed in **Section 4.10, Noise** of this Draft EIR, the Project Site is located within two miles of an airport or airstrip. The closest airport is Long Beach Airport located roughly 1.6 miles north of the Project Site. Review of the Long Beach Airport's Influence Area Map indicates the Project Site is outside of the AIA boundaries. Additionally, there are no other airports or airstrips within 2.0 miles of the Project Site. As such, the Project Site would not expose workers in the Project area to excessive noise levels from airport operations. Accordingly, there would be no impact.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. The nearest airport is located roughly 1.6 miles north of the Project Site and is outside of the airport's AIA boundaries. As such, Alternative 3 would not expose workers to excessive noise levels from airport operations and there would be no impact. Thus, impacts related to airport noise would be similar under Alternative 3 than the Project.

Population and Housing

As discussed in the Initial Study, included in **Appendix A**, of this Draft EIR, the Project would not displace substantial numbers of existing people or housing, therefore, there would be no impact.

POP-1) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

As discussed in **Section 4.11, Population and Housing**, of this Draft EIR, the Project may result in direct population growth from future residents relocating to the City; however, the Project would not induce substantial unplanned population growth, exceeding regional population projections. Therefore, the Project would not induce substantial unplanned population growth and impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing and would include 50 one-bedroom units for seniors and 125 one-bedroom units, 75 two-bedroom units, and 40 three-bedroom units for student housing, resulting in a total of 290 dwelling units with a total of 445 bedrooms overall.

As described in **Section 4.11**, **Population and Housing, of this Draft EIR,** the estimated population of the City in 2050, which was derived using a County-level population to housing ratio from the 2024 RTP/SCS and applying it to the City's future household growth, is 495,349 persons. This represents a total increase of 5.9 percent, or 27,449 persons, from approximately 467,900 persons in 2019. The population in the Project's proposed buildout year (2026) is estimated to be 474,099 persons. The Project's anticipated population growth (445 bedrooms) would represent approximately 7 percent of the City's anticipated growth between 2019 and 2026, and approximately 1.6 percent of the City's anticipated growth between 2019 and 2050. Therefore, population projections estimated under Alternative 3 would be lower than under the Project. Thus, the Project's estimated population growth would be within regional growth projections for the City.

Growth forecasts contained in SCAG's 2024 RTP/SCS indicate that the number of households within the City will increase from 169,300 in 2019 to 197,300 in 2050, representing an increase of 28,000 households. Alternative 3 would include 290 units, which represents 1 percent of the anticipated increase for the City by 2050. Additionally, as outlined in the City's General Plan Housing Element, the City's RHNA allocation of housing between October 2021 and October 2029 has an objective of constructing 26,502 new units. The proposed 290 housing units for Alternative 3 would represent approximately 1 percent of the number of new units planned to be constructed by the City per the Housing Element. Alternative 3 would provide a greater number of units than the Project and would help the City reach its RHNA allocation goals faster than the Project. Alternative 3 would be consistent with SCAG's 2024 RTP/SCS, it would help the City reach it's RHNA goals quicker than the Project. Overall, although Alternative 3 may result in direct population growth from future residents relocating to the City, Alternative 3 would not induce substantial unplanned population growth exceeding regional population projections. Therefore, Alternative 3 would not induce substantial unplanned population growth and impacts would be less than significant.

Similar to the Project, Alternative 3 would not include components such as the extension of roads or existing infrastructure that would result in the indirect population growth within the City. Therefore, Alternative 3 would not induce substantial unplanned population growth and impacts would be less than significant. Impacts to population growth under Alternative 3 would be similar to the Project.

Public Services

PUB-1) Fire Protection?

PUB-2) Police Protection?

PUB-3) Schools?

PUB-4) Parks?

PUB-5) Other public facilities?

As discussed in **Section 4.15, Public Services**, of the Initial Study included in **Appendix A** of this Draft EIR, the Project would have a less than significant impact in regard to Public Services. Although Alternative 3 may result in direct population growth from future residents relocating to the City, Alternative 3 would not induce substantial unplanned population growth exceeding regional population projections which would substantially impact public services. Impacts to fire protection services, police protection services, schools, parks, and other public facilities would be less than significant and would be similar to the Project.

Recreation

REC-1) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

REC-2) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

As discussed in the Initial Study, included as **Appendix A** of this Draft EIR, impacts to recreational facilities would have less than significant impacts. Students residing on the Project Site would likely primarily utilize the recreational amenities on-site or amenities on-campus. Furthermore, LBMC Section 18.18.180, Park Fee as Additional and Supplemental Requirements, requires that all residential and nonresidential development projects pay a proportionate share of the cost of providing park land and recreational improvements necessary to meet the needs created by such development. Therefore, the Project would be required to pay the park impact fee. Therefore, impacts to recreational facilities would have a less than significant impact.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing and would provide 290 dwelling units comprised of 445 bedrooms total. Although Alternative 3 may result in direct population growth from future residents relocating to the City, Alternative 3 would not induce substantial unplanned population growth exceeding regional population projections which would substantially impact regional parks or other recreational facilities. Additionally, Alternative 3 would provide recreational space and amenities, including a residential gardening area, dining patio, and a flexible lawn with artificial turf. Additional amenities located on the student floors would include a fitness area and study rooms on the fourth through seventh floors. Alternative 3 would be required to adhere to LBMC Section 18. 18.180, Park Fee as Additional and Supplemental Requirements, and would be required to pay the park impact fee. Therefore, impacts to Recreational amenities would be less than significant and would be similar to the Project under Alternative 3.

Transportation

As discussed in the Initial Study, included in **Appendix A**, of this Draft EIR, the Project would not substantially increase hazards due to geometric design features; therefore, it was determined to have no impact.

TRA-1) Conflict with programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities.

As discussed in **Section 4.12, Transportation,** of this Draft EIR, Project construction would potentially affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel closures. However, the Project would be required to develop a Traffic Management Plan (TMP) and comply with the Long Beach Department of Public Works. The TMP would be required to be stamped and signed by a professional civil or traffic engineer, as part of the Project permit application. The TMP would limit any potential conflicts with transit. Furthermore, the Project would be required to comply with SCAG 2024-2050 RTP/SCS, City of Long Beach General Plan Mobility Element, and Bicycle Master Plan. Accordingly, Project construction would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As the Project would not conflict with a program, plan, ordinance, or policy

addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. As the Project, Alternative 3 would be required to develop a TMP and comply with the Long Beach Department of Public Works. Furthermore, Alternative 3 would be required to comply with SCAG 2024-2050 RTP/SCS, City of Long Beach General Plan Mobility Element, and Bicycle Master Plan. Accordingly, Project construction would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities impacts would be less than significant and would be similar to the Project.

TRA-2) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

As discussed in the Initial Study, included in **Appendix A** of the Draft EIR, the impacts related to VMT would be less than significant. Compared to the existing use, the Project is anticipated to generate 507 daily trips, 112 fewer trips during the weekday AM peak hour, and 3 trips during the weekday PM peak hour. The City of Long Beach Traffic Impact Analysis Guidelines (June 2020) states that a traffic impact study is generally required "for any Project in Long Beach that is expected to generate 500 or more net new daily trips." Based on the City's traffic study guidelines, a traffic study would be needed if the Project generates more than 500 net daily trips. However, it should be noted that the Project generates less than 50 total net new peak hour trips (the City's threshold to analyze LOS at intersections). Therefore, a traffic impact study is not required for the Project. Impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. Alternative 3 would generate 103 net trips (404 fewer trips than the Project). Alternative 3 would generate less trips compared to the Project; therefore, impacts would be less than significant. Thus, impacts would be less under Alternative 3 than the Project.

TRA-4) Result in inadequate emergency access?

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, impacts related to emergency access would be less than significant. Primary vehicular access to the Project Site would be provided via a two-way driveway from Clark Avenue at the Project Site's western boundary. Pedestrian access to the Project Site is provided via sidewalks located along Pacific Coast Highway, East Anaheim Street, and Clark Avenue. Project Site design, including automobile and pedestrian access would comply with the City's design standards and other requirements as established in the LBMC. The Project plans are subject to site and design review and the LBFD would review the site plan prior to the approval of permits for construction of the Project to ensure that adequate emergency access is provided. Accordingly, the Project would not result in inadequate emergency access and any impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing and would not significantly impact emergency access. Similar to the Project, Alternative 3 would be accessible via a two-way driveway from Clark Avenue at the Project Site's western boundary. Pedestrian access to the Project Site is provided via sidewalks located along Pacific Coast Highway, East Anaheim Street, and Clark Avenue. Project Site design, including automobile and pedestrian access would comply with the City's design standards and other requirements as established in the LBMC and would avoid the Project's less than significant impact. Thus, impacts related to emergency access would be similar to the Project under Alternative 3.

Tribal Cultural Resources

TCR-1) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

As discussed in **Section 4.13, Tribal Cultural Resources,** of this Draft EIR, **Appendix C**, **Cultural Resources Assessment**, the existing buildings on the Project Site have been determined to not be eligible for listing in either the CRHR, or in a in a local register of historical resources. Therefore, there would be no impact to historical resources.

Alternative 3 would utilize the same Project Site as the Project. Thus, there would be no impact to historical resources under Alternative 3.

TRC-2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe

A search of the SLF was conducted through the NAHC to determine if any sacred lands or traditional cultural properties on file with the NAHC were within or near the Project Site. The NAHC's SLF record search was positive, indicating that there is record of sacred lands on the Project Site.[3] In compliance with AB 52, the City provided formal notification to California Native American tribal representatives identified by the NAHC. Native American groups may have knowledge about the area's cultural resources and may have concerns about a development's adverse effects on tribal cultural resources. AB 52 allows Tribes 30 days after receiving notification to request consultation. Of the tribes contacted, the City received one consultation request from the Gabrieleño Band of Mission Indians – Kizh Nation, who raised concerns over tribal cultural resources. Implementation of **Mitigation Measure TCR-1**, requiring a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation, would reduce potential impacts to tribal cultural resources to less than significant.

Alternative 3 would adaptively reuse the Project Site with market rate housing. Similar to the Project, under Alternative 3, the City would be required to comply with AB 52 and initiate tribal consultation. Implementation of **Mitigation Measure TCR-1**, requiring a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation, would reduce potential impacts to tribal cultural resources to less than significant. Thus, impacts under Alternative 3 would be similar to the Project.

Utilities and Service Systems

UT-1) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities.

[3] Native American Heritage Commission. March 26, 2024. Native American Heritage Commission Letter and Native American Tribal Consultation List.

As discussed in **Section 4.14, Utilities and Service Systems,** of this Draft EIR, the Project would not require the construction of new water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities offsite. Therefore, impacts associated with both construction and operation of the Project would be less than significant.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. As the Project, Alternative 3 would not require the construction of new water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities offsite. Therefore, impacts associated with both construction and operation of the Project would be less than significant. Thus, impacts under Alternative 3 related to utilities and service systems would be similar to the Project.

UT-2) Sufficient water supplies available to serve the project and reasonably foreseeable future development.

As discussed in **Section 4.14, Utilities and Services Systems**, of this Draft EIR, LBUD has indicated that it would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, and impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. As the Project, LBUD would have sufficient water supplies available to serve Alternative 3 during normal, dry, and multiple dry years. Accordingly, Alternative 3 would have less than significant impact related to water supplies. Thus, impacts related to water supplies would be similar under the Alternative 3 than the Project.

UT-3) Wastewater provider inadequate capacity to serve projected demand.

As discussed in **Section 4.14, Utilities and Services Systems**, of this Draft EIR, the A.K Warren Water Resource Facility and Long Beach Water Reclamation Plant would have adequate capacity to treat the wastewater produced by Project operations. Furthermore, the Project would not require or result in the relocation or construction of new or expanded treatment facilities. Impacts related to wastewater generation would be less than significant.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. As the Project, Alternative 3 would not require or result in the relocation or construction of new or expanded treatment facilities. Therefore, impacts related to wastewater generation would be less than significant. Thus, impacts under Alternative 3 related to wastewater would be similar to the Project.

UT-4) Generate solid waste in excess of State and local standards.

UT-5) Comply with federal, state, and local management, and reduction statues and regulations related to solid waste.

As discussed in **Section 4.14, Utilities and Service Systems**, of this Draft EIR, the Project would not generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, and would comply with CALGreen, State regulations, and City regulations regarding solid waste management. Accordingly, any impacts would be less than significant.

Alternative 3 would adaptively reuse the Project Site with a senior living facility and student housing. As with the Project, Alternative 3 would not generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, and would comply with CALGreen, State regulations, and City regulations regarding solid waste management.

Accordingly, any impacts would be less than significant. Thus, impacts related to solid waste would be similar under Alternative 3 than the Project.

Relationship of the Alternative to the Project Objectives

Alternative 3 consists of circumstances under which Alternative 3 would provide senior housing and student housing on the Project Site. As such, Alternative 3 would meet the following objectives; however, they would not be met to the same degree as the Project and is, thus, considered to be only partially consistent with the following objectives:

- Provide a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design, including light materiality, landscape features, and active ground floor uses with open space amenities.
- Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions through such features as a PV solar panel array, electric vehicle charging stations, energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping.
- Fulfill the city's housing goals by expanding student housing opportunities in proximity to open space, public transportation, and a wide range of services and goods.
- Promote sustainable development through the adaptive reuse of an existing seven-story office building into a 593-bed student housing development that includes supportive uses and amenities that promote interaction and communication between students such as large lounge areas and active outdoor recreational areas.
- Promote pedestrian and bicycle safety and access to the Project Site by engaging with the existing dedicated bike throughfare along Pacific Coast Highway with bicycle parking and lockers on the subterranean parking level 1.
- Increase access to alternative transportation options on the Project Site including zip cars and electric scooters. Increase accessibility to the Project Site through a dedicated ride share pick-up and drop-off locations along East Anaheim Street.
- Provide safe student housing through terraced landscape buffers and a security fence and gate.

5.5.4 Alternative 4: Student Housing and Office Space

Description of the Alternative

Alternative 4 would adaptively reuse the existing building and develop student housing and office space. Alternative 4 would provide separate entrances and elevators that lead to student dormitories and office space. The ground floor would provide student amenities, including a mailroom, industrial kitchen, dining area, communal lounge space, laundry facilities, fitness area, and a men and women's locker room. Outdoor amenities would include an outdoor dining patio, patio, and fitness turf with equipment. No outdoor pool would be provided.

The second to fifth floor would provide 240 dwelling units comprised of 125 one-bedroom, 75 two-bedroom, and 40 three-bedroom units, resulting in the 395 beds overall for student housing. The sixth and seventh floor would provide 34,300 square feet of office space. According to SCAG employee generation rates from the SCAG 2001 Employment Density Study Summary Report, a high-rise office space in Los Angeles County would require 440 average sf per employee.[4] Therefore, the 34,300 square feet of office space would result in approximately 77 office employees. Alternative 4 would maintain the existing three levels of subterranean parking. Alternative 4 would generate 313 net trips. Alternative 4 would be subject to AB 2097 parking requirements and would not enforce minimum parking requirements on a residential and commercial Project if the Project is located within one-half mile of public transit. Alternative 4 would be subject to AB 2097 parking requirements as the site would be located within one-half mile of public transit options including LBT bus service. Therefore, Alternative 4 would provide one parking spot per student (395 spaces) and would provide 77 spaces for the office component. Therefore, Alternative 4 would provide a total of 472 parking spaces to serve the student housing and office uses.

[4] SCAG Employment Density Study, 2001, Table II-B, http://www.mwcog.org/uploads/committee-documents/bl5aX1pa20091008155406.pdf.

Environmental Impacts

Aesthetics

As discussed in **Section 4.1, Aesthetics**, of the Initial Study, included in **Appendix A**, of this Draft EIR, impacts to scenic vistas and scenic resources were determined to have no impact.

AES-3 If in a non-urbanized area, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings?

The Project is in a highly urbanized surrounded by developed office, residential, and commercial uses. Similar to the Project, Alternative 4 would require a General Plan Amendment from the current CC Placetype to the NSC-Moderate Placetype which would permit housing. Alternative 4 would also require a Zoning Code Amendment/Map Change to change the existing zone from CCA to MU-3 to allow adaptive reuse development standards. Upon approval of the Zoning Amendment, Alternative 4 would be consistent with the development standards and regulations of the MU-3 Zoning District, including standards governing scenic quality, including building height, residential density, and FAR. Similar to the Project, Alternative 4 would comply with the required standards and other applicable local regulations pertaining to visual quality and would not conflict with applicable zoning and local regulations governing scenic quality and impacts on scenic quality would be less than significant. Thus, impacts with regard to visual character or quality of public views would be similar to the Project under Alternative 4.

AES-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Similar to the Project, Alternative 4 would include minor additions such as decorative window films, identification signage, a small pavilion building, improvements to the ground level entryways, and open space areas would not involve the use of highly reflective materials known to cause glare. However, while Alternative 4 would introduce new light sources related to new open space, amenity areas, and more active residential uses, lighting developed as part of Alternative 4 would be required to comply with LBMC Chapter 22.30.110, Lighting Design for Safety. As required, lighting is required to be directed and shielded to prevent light and glare from intruding onto adjacent sites, and light standards are not to exceed the building height and be appropriately spaced from adjacent property lines. Therefore, Alternative 4 would not create new source of substantial light or glare which would adversely affect day or nighttime views and impacts would be less than significant. Thus, impacts related to glare would be similar to the Project under Alternative 4.

Air Quality

AQ-1) Conflict with or obstruct implementation of applicable air quality plan?

As discussed in **Section 4.2, Air Quality**, of this Draft EIR, the Project was evaluated for its potential to conflict with or obstruct implementation of an applicable air quality plan using the SCAQMD's 2022 AQMP, which establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving State and national air quality standards. As the Project would not generate localized construction or regional construction or operational emissions that would exceed SCAQMD thresholds of significance, the Project would not violate any air quality standards. Therefore, the Project would not conflict with or obstruct implementation of the applicable air quality plan, and impacts would be less than significant.

Similar to the Project, Alternative 4 would not conflict an applicable air quality plan using the SCAQMD's 2022 AQMP. Similar to the Project, Alternative 4 would not generate localized construction or regional construction or operational emissions that would exceed SCAQMD thresholds of significance and Alternative 4 would not violate any air quality standards. Therefore, Alternative 4 would not conflict with or obstruct implementation of the applicable air quality plan, and impacts would be less than significant. Therefore, impacts would be similar to the Project.

AQ-2) Cumulative increase in criteria pollutants/violation of air quality standards.

As discussed in **Section 4.2, Air Quality**, of this Draft EIR, Project construction emissions would be below SCAQMD's threshold for all criteria pollutants. Additionally, Project operational emissions would not exceed SCAQMD thresholds. Furthermore, construction and operational emissions would not result in a cumulative increase in criteria pollutants or a violation of air quality standards. Impacts to air quality associated with construction and operation of the Project would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Unlike the Project, no outdoor pool would be provided; therefore, Alternative 4 would have reduced construction impacts due to the decrease in development as compared to the Project. Additionally, operational impacts to air quality under Alternative 4 would be less than the Project, due to the reduction in development and vehicle miles traveled. Compared to the Project's 507 net Project trips, Alternative 4 would generate 313 net trips (194 fewer trips than the Project). Therefore, Alternative 4 would not result in a cumulative increase in criteria pollutants and impacts would be less than significant. Thus, impacts under Alternative 4 would be less than the Project.

AQ-3 Expose sensitive receptors to substantial pollutant concentrations.

As discussed in **Section 4.2, Air Quality,** of this Draft EIR, the nearest sensitive receptors are the residences located approximately 170 feet (approximately 52 meters) to the west of the Project Site. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations and any impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Similar to the Project, the nearest sensitive receptors are the residences located approximately 170 feet (approximately 52 meters) to the west of the Project Site. Unlike the Project, no outdoor pool would be provided; therefore, Alternative 4 would have reduced construction impacts due to the decrease in development as compared to the Project. Additionally, operational impacts to air quality under Alternative 4 would be less than the Project, due to the reduction in development and vehicle miles traveled. Compared to the Project's 507 net Project trips, Alternative 4 would Alternative 4 would generate 313 net trips (194 fewer trips than the Project). Accordingly, Alternative 4 would not result in increased exposure of sensitive receptors to pollutant concentrations, and impacts would be less than significant. Thus, impacts would be less under Alternative 4 than the Project.

AQ-4) Other emissions (such as those leading to odors).

As discussed in the Initial Study, provided in **Appendix A** of this Draft EIR, the Project would have a less than significant impact related to odors. The Project is a residential building for students and does not propose to include any odor-inducing uses on the Project Site. Therefore, the Project would result in a less than significant impact related to other emissions leading to odors adversely affecting a substantial number of people.

Alternative 4 would adaptively reuse the Project Site student housing and office space. Similar to the Project, Alternative 4 would be a mixed-use residential and office building that does not

propose to include any odor-inducing uses. Therefore, Alternative 4 would result in a less than significant impact related to other emissions leading to odors. Thus, impacts would be similar to the Project under Alternative 4.

Biological Resources

As discussed in **Section 4.4, Biological Resources** of the Initial Study, included in **Appendix A** of this Draft EIR, impacts to the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan were determined to have no impact.

BIO-1) Adverse effect on any species identified as a candidate, sensitive, or special status species.

BIO-2) Adverse effect on any riparian habitat or other sensitive natural community

BIO-3) Adverse effect on state or federally protected wetlands

BIO-4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species.

BIO-5) Conflict with any local policies or ordinances protecting biological resources.

As discussed in the Initial Study, the Project would have a less than significant impact to biological resources and would not have an adverse effect on any candidate, sensitive, or special status species, riparian habitat or other sensitive natural community, federally protected wetlands, native resident or migratory fish and wildlife species, and conflict with any local policies or ordinances protecting biological resources. Therefore, impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Similar to the Project, Alternative 4 would not have an adverse effect on any species, riparian habitat, wetland, migratory species, or local policies or ordinances protecting biological resources. Accordingly, Alternative 4 would have less than significant impacts in regard to biological resources. Thus, impacts would be similar to the Project under Alternative 4.

Cultural Resources

As discussed in the Initial Study, impacts to historical resources pursuant to § 15064.5 were determined to have no impact.

CUL-2) Significance of an archaeological resource.

As discussed in **Section 4.3, Cultural Resources**, of this Draft EIR, the Cultural Resources Assessment prepared by BCR Consulting LLC on May 23, 2024 (see **Appendix C**) indicates the records search and field survey conducted by BCR Consulting, LLC did not yield any cultural resources within the Project Site boundaries. The Project Site's conditions failed to indicate sensitively for buried archaeological resources due to the Project Site's severely disturbed state associated with excavation, grading, and construction of the existing office building. Construction activities for the Project would involve minimal demolition. However, construction activities could uncover previously known or unknown archaeological resources. Implementation of **Mitigation Measure CUL-1, Inadvertent Discovery of Cultural Resource**, would provide a process for treatment of any archaeological resources inadvertently discovered during Project implementation and would reduce impacts to archaeological resources to less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Unlike the Project, no outdoor pool would be provided; therefore, there would less construction equipment and vibration effects associated with Alternative 4. Although construction of the Project Site would be minimal due to the adaptive reuse of the existing structure, construction activities associated with Alternative 4 could uncover previously known or unknown archaeological resources. To reduce a potential impact to an archaeological resources, Alternative 4 would implement **Mitigation Measure CUL-1, Inadvertent Discovery of Cultural Resources**, thus ensuring that impacts to archaeological resources would be less than significant with mitigation. Thus, impacts under Alternative 4 would be less than significant with mitigation and would be similar to the Project under Alternative 4.

CUL-3) Disturbance of human remains.

As discussed in **Section 4.3, Cultural Resources**, of this Draft EIR, the Cultural Resources Assessment prepared by BCR Consulting LLC (see **Appendix C**) indicates that the Project Site has a low potential for intact surface or subsurface human remains due to the level of previous development. However, it is possible that construction activities could uncover human remains were present within the Project area and were not recorded before or during development. Implementation of **Mitigation Measure CUL-2, Inadvertent Discovery of Human Remains**, would provide a process for treatment of any human remains inadvertently discovered during Project implementation, including requiring a cessation of construction activity until the County coroner can evaluate the discovery and make the necessary findings. With implementation of this mitigation measure, impacts to human remains would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Although construction of the Project Site would be minimal due to the adaptive reuse of the existing structure, construction activities associated with Alternative 4 could result in the discovery of human remains. Similar to the Project, implementation of **Mitigation Measure CUL-2, Inadvertent Discovery of Human Remains** would provide a process for treatment of any human remains and would reduce impacts to less than significant with mitigation. Thus, impacts would be similar to the Project under Alternative 4.

Energy

ENG-1) Wasteful, inefficient, or unnecessary consumption of energy resources.

As discussed in **Section 4.4, Energy** of this Draft EIR, construction and operation of the Project would not result in wasteful, inefficient, and unnecessary consumption of energy, and impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Alternative 4 would have less bedrooms than the Project and would reduce impacts related to efficient energy consumption. Energy consumption during construction and operations of Alternative 4 would be negligible. Additionally, Alternative 4 would be required to comply with all energy efficiency requirements such as CALGreen code. Therefore, Alternative 4 would use less energy during both construction and operations than the Project and would not result in inefficient, wasteful, or unnecessary consumption of energy. Impacts with respect to energy consumption during construction and operations would be less than significant and impacts would be less than the Project.

ENG-2) Conflict with Plans for renewable energy or energy efficiency.

As discussed in **Section 4.4, Energy**, of this Draft EIR, the Project would support and promote the use of renewable energy and energy efficiency and would result in less than significant

impacts. The Project would support Statewide and regional efforts to incorporate green building design features and improve energy efficiency in order to reduce wasteful or inefficient energy consumption; therefore, impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. As with the Project, Alternative 4 would comply with existing Statewide and regional efforts to incorporate green building design features and improve energy efficiency. Alternative 4 would have a less than significant impact regarding the provisions of plans for renewable energy and energy efficiency. Impacts under Alternative 4 would be similar to the Project.

Geology and Soils

As discussed in the Initial Study, included in Appendix A of this Draft EIR, the Project would have no impact to geology and soils, including: a rapture of a known earthquake fault; seismic-related ground failure, including liquefaction; landslides; potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse; expansive soil; and use of septic tanks or alternative wastewater.

GEO-1ii) Strong seismic ground shaking

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the Project Site would not directly or indirectly cause potential adverse effects involving seismic activity and impacts would be less than significant. The Project would involve the adaptive reuse of an existing office building. While the Project Site is located in the highly seismic Southern California region, development in the City is required to adhere to the California Building Standards Code (California Code of Regulations, Title 24) and the Uniform Building Code (UBC), as stated in LBMC Chapter 18.68, Earthquake Hazard Regulations. Therefore, the Project would not directly or indirectly cause potential adverse effects involving seismic ground shaking, and a less than significant impact would occur.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Similar to the Project, Alternative 4 would be located in the highly seismic Southern California region, where development in the City is required to adhere to the California Building Standards Code and the UBC, as stated in LBMC Chapter 18.68, Earthquake Hazard Regulations. Therefore, Alternative 4 would not directly or indirectly cause potential adverse effects involving seismic ground shaking, and a less than significant impact would occur. Thus, impacts related to strong seismic ground shaking would be similar to the Project under Alternative 4.

GEO 2) Result in substantial soil erosion or the loss of topsoil

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the Project would adaptively reuse an existing building and would require minimal grading and earthwork activities. Therefore, the Project would not result in substantial soil erosion or the loss of topsoil and there would be less than significant impacts.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Similar to the Project, Alternative 4 would not result in soil erosion or the loss of topsoil. Alternative 4 would have a less than significant impact related to soil erosion or loss of topsoil. Thus, impacts related to soil erosion or loss of topsoil would be similar to the Project under Alternative 4.

GEO-6) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

As discussed in **Section 4.5, Geology and Soils**, of this Draft EIR, the Project Site is in a highly urbanized environment that is fully developed. According to the Cultural Resources Assessment prepared by BCR Consulting LLC on May 23, 2024, the Project Site is underlain by old shallow marine deposits from the Pleistocene epoch, with surrounding units of Holocene epoch sediment. Pleistocene units. Excavation activities associated with the development of the Project Site would impact the paleontologically sensitive Pleistocene alluvia units. However, excavation of the Project Site would be minimal due to the adaptive reuse of the existing structure. With implementation of **Mitigation Measure GEO-1, Paleontological Monitoring**, and **Mitigation Measure GEO-2, Paleontological Documentation** impacts to paleontological resources would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Although excavation of the Project Site would be minimal due to the adaptive reuse of the existing structure, construction activities associated with Alternative 4 could result in impacts to paleontological resources. Implementation of **Mitigation Measure GEO-1, Paleontological Monitoring**, and **Mitigation Measure GEO-2, Paleontological Documentation** would result in less than significant impacts to paleontological resources. Thus, impacts related to paleontological resources would be similar to the Project under Alternative 4.

Greenhouse Gas Emissions

GHG-1) Generation of GHG emissions.

As discussed in **Section 4.6, Greenhouse Gas Emission**, of this Draft EIR, the Project would generate GHG emissions due to construction and operational activities. The Project would generate approximately 817 $MTCO_2e$ annually from both construction and operations and would not exceed the SCAQMD's proposed GHG threshold of 3,000 $MTCO_2e$ per year. Therefore, impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Unlike the Project, Alternative 4 would not incorporate an outdoor pool. Therefore, there would less construction equipment used, which would result in lower emissions than the Project. Compared to the Project's 507 net trips, Alternative 4 would generate net 313 trips (194 fewer trips than the Project) which would generate lower GHG emissions during operations. Therefore, Alternative 4, with respect to GHG emission impacts on the environment would be less than the Project.

GHG-2) Conflict with applicable plans, policies, regulations, or recommendations.

As discussed in **Section 4.6, Greenhouse Gas Emissions,** of this Draft EIR, the Project would be consistent with Statewide, regional, and local plans, policies, regulations, and recommendations to reduce GHG emissions from development. Alternative 4, as with the Project would be consistent with the City of Long Beach Climate Action and Adaptation Plan, CALGreen, 2022 Electric Code, California Air Resource Board Scoping Plan Consistency, and 2020 RTP/SCS. Impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant under Alternative 4 and impacts would be similar to those of the Project.

Hazards and Hazardous Materials

As discussed in **Section 4,9, Hazards and Hazardous Materials** of the Initial Study, included in **Appendix A** of this Draft EIR, the Project Site would not be included on a list of hazardous

materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would not create a significant hazard to the public or the environment; therefore, there would be no impact related to hazardous materials.

HAZ-1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

As discussed in **Section 4.7, Hazards and Hazardous Materials**, of this Draft EIR, construction activities required for the Project would involve interior and pavement demolition, pool construction, interior renovation and construction, and architectural coating. However, compliance with CalOSHA standards, SCAQMD Rules, and the SWPPP would reduce impacts to less than significant. Similarly, Project operations would involve use of common chemicals; however, compliance with applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential to release contaminants. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with a with student housing and office space. As with the Project, Alternative 4 would require interior renovation and construction and architectural coating. Alternative 4 would not provide a pool, therefore, no earthwork would be required. Alternative 4 would be required to comply with CalOSHA standards, SCAQMD Rules, and the SWPPP would reduce impacts to less than significant. Similarly, Project operations would involve use of common chemicals; however, compliance with applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential to release contaminants. Therefore, Alternative 4 would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts would be less than significant and similar to the Project.

HAZ-2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

As discussed in **Section 4.7, Hazards and Hazardous Materials**, of this Draft EIR, the Project Site is not located on a hazardous sites list compiled pursuant to California Government Code Section 65962.5. Furthermore, Project operations would likely involve uses employing common maintenance and janitorial supplies, such as solvents, paints, and thinners for Project Site maintenance, herbicides, and pesticides for landscaping, and other common chemicals. Hazardous materials/chemicals such as cleaners, paints, solvents, and fertilizers in low quantities do not pose a significant threat related to the release of hazardous materials into the environment. Therefore, Project operations would not create a significant hazard to the public or the environment, and Project impacts during Project operations would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. As with the Project, Alternative 4 would use the same Project Site, which is not located on a hazardous sites list. Construction of Alternative 4, would not involve earthwork or demolition. As with the Project, Alternative 4 would likely involve uses employing common maintenance and janitorial supplies, such as solvents, paints, and thinners for Project Site maintenance, herbicides, and pesticides for landscaping, and other common chemicals. Therefore, impacts under Alternative 4 related to the accidental release of hazardous materials would be less than significant and similar to the Project.

HAZ-3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing proposed school.

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the closest school is the Woodrow Wilson High School, located approximately 0.45 mile southwest from the Project Site, at 4400 East 10th Street. No truck routes are located adjacent to Woodrow Wilson High School. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Similar to the Project, Alternative 4 would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant. Thus, impacts would be similar to the Project under Alternative 4.

HAZ-5) Located within an airport land use plan.

As discussed in **Section 4.7, Hazards and Hazardous Materials**, of this Draft EIR, the nearest airport to the Project Site is the Long Beach Municipal Airport, located 1.60 miles to the north of the Project Site. Nevertheless, as explained in **Section 4.10, Noise**, of this Draft EIR, review of the Project's AIA map indicates that the Project is located outside the AIA boundaries. Additionally, there are no other airports or airstrips within 2.0 miles of the Project Site. As such, although the Project is located within two miles of a public airport, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area.

Alternative 4 would use the same Project Site as the Project. Therefore, although Alternative 4 would be located within two miles of a public airport, Alternative 4 would not result in a safety hazard or excessive noise for people residing or working in the Project area. Therefore, impacts under Alternative 4 would be less than significant and would be similar to the Project.

HAZ-6) Interfere with an emergency response plan or emergency evacuation plan.

As discussed in **Section 4.7. Hazards and Hazardous Materials**, of the Draft EIR, the City's Natural Hazard Mitigation Plan was adopted in March 2023 and includes policies and programs to reduce the potential loss of life and property damage as a result of natural disasters. Project construction would not require the full or partial closure of roads. In addition, the Project would be reviewed by the LBFD to confirm that adequate emergency access for emergency vehicles is provided. Therefore, the Project would not interfere within an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with senior living facility and student housing. As with the Project, construction of Alternative 4 would not require the full or partial closure of roads. In addition, Alternative 4 would be reviewed by LBFD to confirm that adequate emergency access for emergency vehicles is provided. Therefore, Alternative 4 would not interfere with an adopted emergency response plan or emergency evacuation plan. Impacts under Alternative 4 related to emergency response plan or emergency excavation plans would be less than significant and would be similar to the Project.

HAZ-7) Expose people or structures to significant risk of loss, injury or death, involving wildfires.

As discussed in the Initial Study included in **Appendix A** of this Draft EIR the Project would not expose people or structures to a significant risk of loss, injury or death involving wildfires. The Project Site is not located within a VHFHSZ, SRA or LRA. Accordingly, the Project would not expose people or structures, either directly or indirectly, to a significance risk of loss, injury, or death involving wildland fires, and impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Similar to the Project, Alternative 4 would not expose people or structures to a significant risk of loss, injury or death involving wildfires. The Project Site is not located within a VHFHSZ, SRA, or LRA. Alternative 4 would have less than significant impacts with regard to injury or death involving wildfires. Thus, impacts related to wildfires would be similar to the Project under Alternative 4.

Hydrology and Water Quality

As discussed in **Section 4.10, Hydrology and Water Quality** of the Initial Study, included in **Appendix A** of this Draft EIR, the Project Site would not be located in flood hazard, tsunami, or seiche zones, and risk the release of pollutants; therefore, impacts to flood hazards were determined to have no impact.

HWQ-1) Violate any water quality standards or waste discharge requirements or degrade surface or ground water quality.

As discussed in **Section 4.8, Hydrology and Water Quality**, of this Draft EIR construction activities associated with the development of the Project would require minimal excavation and grading, such activities may require the use of water for dust mitigation. Although the Project would require minimal excavation and grading, such activities may require the use of water for dust mitigation. Water from dust control and other liquids such as fuels, lubricants, and liquid wastes can create runoff that could temporarily affect water quality. However, such impacts to water quality would be temporary and would last only for the duration of the proposed construction activities. Implementation of the Project could introduce new sources of potential stormwater pollution, such as cleaning solvents, pesticides for landscaping, and petroleum products. Stormwater, including runoff from the proposed building and designated parking areas, could carry pollutants into public storm drains during operations. However, as the Project involves the adaptive reuse of an existing building on an already developed site, any impacts to surface and groundwater quality would be similar to existing conditions and impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Although Alternative 4 would not require excavation and grading, construction activities may require the use of water for dust mitigation. Water from dust control and other liquids such as fuels, lubricants, and liquid wastes can create runoff that could temporarily affect water quality. However, such impacts to water quality would be temporary and would last only for the duration of the proposed construction activities. Implementation of Alternative 4 could introduce new sources of potential stormwater pollution, such as cleaning solvents, pesticides for landscaping, and petroleum products. Stormwater, including runoff from the proposed building and designated parking areas, could carry pollutants into public storm drains during operations. As Alternative 4 involves the adaptive reuse of an existing building on an already developed site, any impacts to surface and groundwater quality would be less than significant and would be similar to the Project.

HWQ-2) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

As discussed in **Section 4.8, Hydrology and Water Quality**, of this Draft EIR, no water supply wells are located within or in the vicinity of the Project Site. Based on the relatively short-term and minimal construction-related water needs, and the diversified sources of the City's water supplies, construction-related water use would not substantially lower groundwater levels in the basin. The Project would adaptively reuse the existing building; therefore, the total amount of impervious surface under the Project would be similar to existing conditions. Furthermore, the Project Site is not located within a groundwater recharge area or facility, nor does it represent a source of groundwater recharge. Therefore, the Project would not substantially deplete groundwater supplies nor interfere substantially with groundwater recharge such that the Project would impede the basins' sustainable groundwater management, and impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. As with the Project, no water supply wells are located within or in the vicinity of the Project Site. Furthermore, the Project Site under Alternative 4 is not located within a groundwater recharge area or facility, nor does it represent a source of groundwater recharge. Therefore, Alternative 4 would not substantially deplete groundwater supplies nor interfere substantially with groundwater recharge such that Alternative 4 would impede the basins' sustainable groundwater management, and impacts would be less than significant and similar to the Project.

HWQ-3a) Alter existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation on-or off-site.

As discussed in **Section 4.8, Hydrology and Water Quality**, of this Draft EIR, upon completion of construction, the drainage pattern of the Project Site would be similar to existing conditions and runoff would continue to discharge to the existing storm drain and catch basin system to the north of the Project Site. The Project would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would result in substantial erosion or siltation on- or off-site. On-site runoff would be directed to on-site inlet structures, including catch basins to convey runoff to a stormwater treatment system. Furthermore, the Project would be required to prepare an erosion control plan and implement BMPs to minimize on-site and off-site erosion and siltation. Impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. As with the Project, Alternative 4 would not alter the course of a stream or a river and would not substantially increase impervious surface in a manner that would result in substantial erosion or siltation on-or-off-site. Furthermore, as with the Project, Alternative 4 would be required to prepare an erosion control plan and implement BMPs to minimize on-site and off-site erosion and siltation. Impacts would be less than significant. Thus, impacts under Alternative 4 related to the existing drainage pattern would be similar to the Project.

HWQ-3b) Alter existing drainage pattern of the site or area in a manner which would result in substantial flooding on- and off-site?

As discussed in **Section 4.8, Hydrology and Water Quality**, of this Draft EIR, per the FEMA FIRMette the Project Site is located within Zone X, which denotes an area with a minimal flood hazard. The Project involves the adaptive reuse of an existing building, upon completion of construction, the amount of impervious surface and drainage patterns of the Project Site would be similar to existing conditions. The Project would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would increase surface runoff that would result in flooding. Impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. As with the Project, Alternative 4 would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would increase surface runoff that would result in flooding. Furthermore, as with the Project, the proposed drainage design under Alternative 4 would be reviewed and approved by the City. Thus, impacts related to flooding under Alternative 4 would be less than significant. Thus, impacts under Alternative 4 related to flooding would be similar to the Project.

HWQ-3c) alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff

As discussed in **Section 4.8, Hydrology and Water Quality***,* upon completion of construction, the drainage pattern of the Project Site would be similar to existing conditions and runoff would continue to discharge to the existing storm drain and catch basin system to the north of the Project Site. The Project would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would result in substantial additional sources of polluted runoff.

Alternative 4 would adaptively reuse the Project Site with a with student housing and office space. As with the Project, the drainage pattern of the Project Site under Alternative 4 would be similar to existing conditions and runoff would continue to discharge to the existing storm drain and catch basin system to the north of the Project Site. Alternative 4 would not alter the course of a stream or river and would not substantially increase impervious surface in a manner that would result in additional sources of polluted runoff. Thus, impacts under Alternative 4 related to polluted runoff would be less than significant and would be similar to the Project.

HWQ-3d) Alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows.

As described in **Section 4.8, Hydrology and Water Quality**, upon completion of construction, the drainage pattern of the Project Site would be similar to existing conditions. The Project would not alter the course of a stream or a river and would not substantially increase impervious surface in a manner that would result in impediments to or redirection of flood flows. Any impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with a senior living facility and student housing. As with the Project, upon completion of Alternative 4, the drainage pattern of the Project Site would be similar to existing conditions. Furthermore, Alternative 4 would not alter the course of a stream or a river and would not substantially increase impervious surface in a manner that would result in impediments to or redirection of flood flows. As such, Alternative 4 would avoid the Project's less than significant impact. Thus, impacts under Alternative 4 related to flood flows would be similar to the Project.

HWQ-5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

As described in **Section 4.8, Hydrology and Water Quality,** the Project is within the jurisdiction of the LA RWQCB Basin Plan, which identifies beneficial uses for surface water and groundwater and establishes water quality objectives to attain those beneficial uses, together known as water

quality standards. The Project would not degrade water quality in a manner that would interfere with the beneficial uses of local surface water as established by the Basin Plan. The Project would comply with the City of Long Beach's Stormwater and Runoff Pollution Control Ordinance, as well as the current MS4 permit (NPDES Permit No. CAS004003). Furthermore, as described in Threshold HWQ-2, the Project Site is within the adjudicated Central Basin, and the Central Basin Judgment serves the same purpose as a groundwater management plan. Since the Project would be served by the City, who is in turn allocated a sustainable allotment of groundwater (i.e., the City's APA), the Project would not conflict with the Judgment. Therefore, the Project would not conflict with or obstruct or obstruct water quality control plans, and impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. As with the Project, Alternative 4 would not degrade water quality in a manner that would interfere with the groundwater management plan. Therefore, Alternative 4 would not conflict with or obstruct the implementation of water quality control plan or sustainable groundwater management plan and impacts would be less than significant. Thus, impacts under Alternative 4 related to the implementation of a water quality control plan or sustainable groundwater management plan would be similar to the Project.

Land Use and Planning

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, the Project would not physically divide an established community; therefore, no impacts would occur.

LUP-2) Conflict with any land use plan, policy or regulation.

As described in **Section 4.9, Land use and Planning** of this Draft EIR the Project would not conflict with any land use plan, policy, or regulation. The Project proposes a General Plan Amendment/Map Change to change the existing land use designation of the Project Site from CC to NSC-Moderate. The Project also requires a Zoning Code change to modify the existing zone from CCA to Mixed-Use MU-3 to allow the Project's student residential uses and to enable the Project to take advantage of the adaptive reuse development standards. The Project would also require the approval of a Conditional Use Permit to allow the "Special Group Residence" and Site Plan review of adaptive reuse. Upon approval of entitlements by the City, the Project would not conflict with the City of Long Beach General Plan, including the City's Land Use Element, Housing Element, Urban Design Element. Additionally, the Project would not conflict with the City's Zoning Ordinance and the SCAG 2024-2050 RTP/SCS.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Similar to the Project, Alternative 4 would not conflict with any land use plan, policy, or regulation. Alternative 4 would require a General Plan Amendment from the current CC Placetype to the NSC-Moderate Placetype which would permit residential uses. Alternative 4 would also require a Zoning Code Amendment/Map Change to change the existing zone from CCA to Mixed-Use MU-3 to allow a Special Group Residence and adaptive reuse development standards. Upon approval, the Project Site would be able to accommodate student housing and office space. Therefore, Alternative 4 would not conflict with the City of Long Beach General Plan, including the City's Land Use Element, Housing Element, and Urban Design Element.

As described in **Section 4.11**, **Population and Housing,** of this Draft EIR growth forecasts contained in SCAG's 2024 RTP/SCS indicate that the number of households within the City will increase from 169,300 in 2019 to 197,300 in 2050, representing an increase of 28,000 households. Alternative 4 would include 240 units, resulting in a total of 395 beds overall for student housing. Additionally, Alternative 4 would include 34,300 SF dedicated to office space

which would result in approximately 77 employees. Alternative 4 would provide a total of 240 units which would represents 0.9 percent of the anticipated household increase for the City by 2050. As described in **Section 4.11, Population and Housing**, of this Draft EIR, growth forecasts in SCAG's 2024 RTP/SCS indicate that the number of employees within the City will increase from 195,300 in 2019 to 213,400 in 2050, representing an increase of 18,100 employees . Alternative 4 would provide a total of 77 employees which would represent 0.4 percent of the anticipated employee increase for the City by 2050.

Additionally, as outlined in the City's General Plan Housing Element, the City's RHNA allocation of housing between October 2021 and October 2029 has an objective of constructing 26,502 new units. The proposed 240 units for Alternative 4 would represent approximately 0.9 percent of the number of new units planned to be constructed by the City per the Housing Element. Therefore, Alternative 4 would provide a greater number of units than the Project and would therefore reach the City's RHNA allocations quicker than the Project. Alternative 4 would be consistent with SCAG's 2024 RTP/SCS and would help the City reach it's RHNA goals to a greater degree than the Project.

As with the Project, Alternative 4 would be generally consistent with the goals and policies outlined in the City of Long Beach General Plan. Alternative 4 would be generally consistent with the goals and policies outlined in the City's Housing Element, including Goal 4, Address the Unique Housing Needs of Special Needs Residents by providing student housing .Alternative 4 would fulfill this goal to a greater degree than the Project, as it would provide more units. Impacts under Alternative 4 would be similar to the Project.

Noise

NOI-1) Noise levels in excess of standards.

As discussed in **Section 4.10, Noise,** of this Draft EIR, noise impacts associated with Project construction would not exceed applicable standards at noise sensitive receptor locations. Operational noise would not exceed the applicable noise standards, and operational noise impacts are considered less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Unlike the Project, Alternative 4 would not have include a pool, which would result in less construction equipment during construction. Therefore, as Alternative 4 would not include a pool; there would be a reduced construction schedule and construction intensity compared to the Project, impacts would be less than those of the Project. Additionally, Alternative 4 would involve a fewer number of bedrooms and would only 313 net trips (194 fewer trips than the Project). Therefore, Alternative 4 would have less than significant impacts with regards to noise. As such, impacts related to noise levels would be less than the Project.

NOI-2) Excessive groundborne vibration or groundborne noise levels.

As discussed in **Section 4.10, Noise,** of this Draft EIR, construction activities at the Project Site would have the potential to generate groundborne vibration. However, Project construction-related vibration impacts would not exceed impact thresholds and impacts would be less than significant. Truck activity associated with Project operations would produce ground-borne vibration; however, vibration impacts would not exceed impact thresholds and impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Alternative 4 would not include an outdoor pool; therefore, there would be less construction equipment and vibration compared to the Project. Impacts would be less due to less construction

equipment and vibration compared to the Project. Alternative 4 would result in less than significant impacts related to the generation of groundborne vibration during construction and impacts would be less than the Project.

NOI-3) Located in the vicinity of a private airstrips.

As discussed in **Section 4.10, Noise** of this Draft EIR, the Project Site is located within two miles of an airport or airstrip. The closest airport is Long Beach Airport located roughly 1.6 miles north of the Project Site. Review of the Long Beach Airport's Influence Area Map indicates the Project Site is outside of the AIA boundaries. Additionally, there are no other airports or airstrips within 2.0 miles of the Project Site. As such, the Project Site would not expose workers in the Project area to excessive noise levels from airport operations. Accordingly, there would be no impact.

Alternative 4 would adaptively reuse the Project Site with a student housing and office space. The nearest airport is located roughly 1.6 miles north of the Project Site and is outside of the airport's AIA boundaries. As such, Alternative 4 would not expose workers to excessive noise levels from airport operations and there would be no impact. Thus, impacts related to airport noise would be similar under Alternative 4 than the Project.

Population and Housing

As discussed in the Initial Study, included in **Appendix A**, of this Draft EIR, the Project would not displace substantial numbers of existing people or housing, therefore, there would be no impact.

POP-1) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

As discussed in **Section 4.11, Population and Housing**, of this Draft EIR, the Project may result in direct population growth from future residents relocating to the City; however, the Project would not induce substantial unplanned population growth, exceeding regional population projections. Therefore, the Project would not induce substantial unplanned population growth and impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Alternative 4 would include 240 dwelling units, resulting in a total of 395 beds overall for student housing. Additionally, Alternative 4 would include 34,300 SF dedicated to office space which would result in approximately 77 employees.

The population in the Project's proposed buildout year (2026) is estimated to be 474,099 persons. Under Alternative 4, the anticipated population growth (395 bedrooms) would represent approximately 6.3 percent of the City's anticipated growth between 2019 and 2026, and approximately 1.4 percent of the City's anticipated growth between 2019 and 2050. Overall, although Alternative 4 may result in direct population growth from future residents relocating to the City, Alternative 4 would not induce substantial unplanned population growth exceeding regional population projections. Therefore, Alternative 4 would not induce substantial unplanned population growth and impacts would be less than significant.

Alternative 4 would provide a total of 240 dwelling units which would represents 1 percent of the anticipated household increase for the City by 2050. As described in **Section 4.11, Population and Housing**, of this Draft EIR, growth forecasts in SCAG's 2024 RTP/SCS indicate that the number of employees within the City will increase from 195,300 in 2019 to 213,400 in 2050, representing an increase of 18,100 employees Alternative 4 would provide a total of 77 employees which would represent 0.4 percent of the anticipated increase for the City by 2050.

Additionally, as outlined in the City's General Plan Housing Element, the City's RHNA allocation of housing between October 2021 and October 2029 has an objective of constructing 26,502 new units. The proposed 240 dwelling units for Alternative 4 would represent approximately 1 percent of the number of new units planned to be constructed by the City per the Housing Element. Therefore, Alternative 4 would provide more units compared to the Project and would help reach the City's RHNA allocations at a greater degree than the Project. Therefore, Alternative 4 would be consistent with SCAG's 2024 RTP/SCS and impacts to housing would be less than significant.

Alternative 4 would not induce substantial unplanned population growth, exceeding regional population projections. Similar to the Project, Alternative 4 would not include components such as the extension of roads or existing infrastructure that would result in the indirect population growth within the City. Therefore, Alternative 4 would not induce substantial unplanned population growth and impacts would be less than significant. Thus, impacts to population and housing would be similar to the Project.

Public Services

PUB-1) Fire Protection?

PUB-2) Police Protection?

PUB-3) Schools?

PUB-4) Parks?

PUB-5) Other public facilities?

As discussed in **Section 4.15, Public Services**, of the Initial Study included in **Appendix A** of this Draft EIR, the Project would have a less than significant impact in regard to Public Services. Impacts to fire protection services, police protection services, schools, parks, and other public facilities would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space and would provide a total of 240 units and 395 bedrooms. Although Alternative 4 may result in direct population growth from future residents relocating to the City, Alternative 4 would not induce substantial unplanned population growth exceeding regional population projections which would substantially impact public services. Impacts to fire protection services, police protection services, schools, parks, and other public facilities would be less than significant and would be similar to the Project.

Recreation

REC-1) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

REC-2) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

As discussed in the Initial Study, included as **Appendix A** of this Draft EIR, impacts to recreational facilities would have less than significant impacts. Students residing on the Project Site would likely primarily utilize the recreational amenities on-site. Furthermore, LBMC Section 18.18.180, Park Fee as Additional and Supplemental Requirements, requires that all residential and nonresidential development projects pay a proportionate share of the cost of providing park land

and recreational improvements necessary to meet the needs created by such development. Therefore, the Project would be required to pay the park impact fee. Therefore, impacts to recreational facilities would have a less than significant impact.

Alternative 4 would adaptively reuse the Project Site with a student housing and office space and would provide 240 units comprised of 395 bedrooms total and 34,300 square feet of office space. Although Alternative 4 may result in direct population growth from future residents relocating to the City, Alternative 4 would not induce substantial unplanned population growth exceeding regional population projections which would substantially impact regional parks or other recreational facilities. Additionally, Alternative 4 would provide recreational space and amenities. The ground floor would provide student amenities, including a mailroom, industrial kitchen, dining area, communal lounge space, laundry facilities, fitness area, and a men and women's locker room. Outdoor amenities would include an outdoor dining patio, patio, and fitness turf with equipment. Alternative 4 would be required to adhere to LBMC Section 18. 18.180, Park Fee as Additional and Supplemental Requirements, and would be required to pay the park impact fee. Therefore, impacts to Recreational amenities would be less than significant and would be similar to the Project.

Transportation

As discussed in the Initial Study, included in **Appendix A**, of this Draft EIR, the Project would not substantially increase hazards due to geometric design features; therefore, it was determined to have no impact.

TRA-1) Conflict with programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities.

As discussed in **Section 4.12, Transportation,** of this Draft EIR, Project construction would potentially affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel closures. However, the Project would be required to develop a Traffic Management Plan (TMP) and comply with the Long Beach Department of Public Works. The TMP would be required to be stamped and signed by a professional civil or traffic engineer, as part of the Project permit application. The TMP would limit any potential conflicts with transit. Furthermore, the Project would be required to comply with SCAG 2024-2050 RTP/SCS, City of Long Beach General Plan Mobility Element, and Bicycle Master Plan. Accordingly, Project construction would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. As the Project, Alternative 4 would be required to develop a TMP and comply with the Long Beach Department of Public Works. Furthermore, Alternative 4 would be required to comply with SCAG 2024-2050 RTP/SCS, City of Long Beach General Plan Mobility Element, and Bicycle Master Plan. Accordingly, construction of Alternative 4 would be similar to that of the Project and would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As Alternative 4 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities impacts would be less than significant and would be similar to the Project.

TRA-2) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

As discussed in the Initial Study, included in **Appendix A** of the Draft EIR, the impacts related to VMT would be less than significant. Compared to the existing use, the Project is anticipated to generate 507 daily trips, 112 fewer trips during the weekday AM peak hour, and 3 trips during the weekday PM peak hour. The City of Long Beach Traffic Impact Analysis Guidelines (June 2020) states that a traffic impact study is generally required "for any project in Long Beach that is expected to generate 500 or more net new daily trips." Based on the City's traffic study guidelines, a traffic study would be needed if the project generates more than 500 net daily trips. However, it should be noted that the Project generates less than 50 total net new peak hour trips (the City's threshold to analyze LOS at intersections). Therefore, a traffic impact study is not required for the Project. Impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. Alternative 4 would generate 313 net trips compared to the existing conditions on the Project Site. Under Alternative 4, the Project would generate less trips compared to the Project; therefore, impacts would be less than significant. Thus, impacts related to the VMT would be less under Alternative 4 than the Project.

TRA-4) Result in inadequate emergency access?

As discussed in the Initial Study, included in **Appendix A** of this Draft EIR, impacts related to emergency access would be less than significant. Primary vehicular access to the Project Site would be provided via a two-way driveway from Clark Avenue at the Project Site's western boundary. Pedestrian access to the Project Site is provided via sidewalks located along Pacific Coast Highway, East Anaheim Street, and Clark Avenue. Project Site design, including automobile and pedestrian access would comply with the City's design standards and other requirements as established in the LBMC. The Project plans are subject to site and design review and the LBFD would review the site plan prior to the approval of permits for construction of the Project to ensure that adequate emergency access is provided. Accordingly, the Project would not result in inadequate emergency access and any impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space and would not significantly impact emergency access. Similar to the Project, Alternative 4 would be accessible via a two-way driveway from Clark Avenue at the Project Site's western boundary. Pedestrian access to the Project Site is provided via sidewalks located along Pacific Coast Highway, East Anaheim Street, and Clark Avenue. Project Site design, including automobile and pedestrian access would comply with the City's design standards and other requirements as established in the LBMC and would avoid the Project's less than significant impact. Thus, impacts related to emergency access would be similar to the Project under Alternative 4.

Tribal Cultural Resources

TCR-1) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

As discussed in **Section 4.13, Tribal Cultural Resources,** of this Draft EIR, **Appendix C**, **Cultural Resources Assessment**, the existing buildings on the Project Site have been

determined to not be eligible for listing in either the CRHR, or in a in a local register of historical resources. Therefore, there would be no impact to historical resources.

Alternative 4 would utilize the same Project Site as the Project. Thus, there would be no impact to historical resources.

TRC-2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe

A search of the SLF was conducted through the NAHC to determine if any sacred lands or traditional cultural properties on file with the NAHC were within or near the Project Site. The NAHC's SLF record search was positive, indicating that there is record of sacred lands on the Project Site.[5] In compliance with AB 52, the City provided formal notification to California Native American tribal representatives identified by the NAHC. Native American groups may have knowledge about the area's cultural resources and may have concerns about a development's adverse effects on tribal cultural resources. AB 52 allows Tribes 30 days after receiving notification to request consultation. Of the tribes contacted, the City received one consultation request from the Gabrieleño Band of Mission Indians – Kizh Nation, who raised concerns over tribal cultural resources. Implementation of **Mitigation Measure TCR-1**, requiring a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation, would reduce potential impacts to tribal cultural resources to less than significant.

Alternative 4 would adaptively reuse the Project Site. Similar to the Project, under Alternative 4, the City would be required to comply with AB 52 and initiate tribal consultation. Implementation of **Mitigation Measure TCR-1**, requiring a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation, would reduce potential impacts to tribal cultural resources to less than significant. Thus, impacts under Alternative 4 would be similar to the Project.

Utilities and Service Systems

UT-1) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities.

As discussed in **Section 4.14, Utilities and Service Systems,** of this Draft EIR, the Project would not require the construction of new water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities offsite. Therefore, impacts associated with both construction and operation of the Project would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. As the Project, Alternative 4 would not require the construction of new water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities offsite. Therefore, impacts associated with both construction and operation of the Project would be less than significant. Thus, impacts under Alternative 4 related to utilities and service systems would be similar to the Project.

[5] Native American Heritage Commission. March 26, 2024. Native American Heritage Commission Letter and Native American Tribal Consultation List.

UT-2) Sufficient water supplies available to serve the project and reasonably foreseeable future development.

As discussed in **Section 4.14, Utilities and Services Systems**, of this Draft EIR, LBUD has indicated that it would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, and impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. As the Project, LBUD would have sufficient water supplies available to serve Alternative 4 during normal, dry, and multiple dry years. Accordingly, Alternative 4 would have less than significant impact related to water supplies. Thus, impacts related to water supplies would be similar under the Alternative 4 than the Project.

UT-3) Wastewater provider inadequate capacity to serve projected demand.

As discussed in **Section 4.14, Utilities and Services Systems**, of this Draft EIR, the A.K Warren Water Resource Facility and Long Beach Water Reclamation Plant would have adequate capacity to treat the wastewater produced by Project operations. Furthermore, the Project would not require or result in the relocation or construction of new or expanded treatment facilities. Impacts related to wastewater generation would be less than significant.

Alternative 4 would adaptively reuse the Project Site with Student housing and office space. As the Project, Alternative 4 would not require or result in the relocation or construction of new or expanded treatment facilities. Therefore, impacts related to wastewater generation would be less than significant. Thus, impacts under Alternative 4 related to wastewater would be similar to the Project.

UT-4) Generate solid waste in excess of State and local standards.

UT-5) Comply with federal, state, and local management, and reduction statues and regulations related to solid waste.

As discussed in **Section 4.14, Utilities and Service Systems**, of this Draft EIR, the Project would not generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, and would comply with CALGreen, State regulations, and City regulations regarding solid waste management. Accordingly, any impacts would be less than significant.

Alternative 4 would adaptively reuse the Project Site with student housing and office space. As with the Project, Alternative 4 would not generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, and would comply with CALGreen, State regulations, and City regulations regarding solid waste management. Accordingly, any impacts would be less than significant. Thus, impacts related to solid waste would be similar under Alternative 4 than the Project.

Relationship of the Alternative to the Project Objectives

Alternative 4 consists of circumstances under which Alternative 4 would provide student housing and office space on the Project Site. As such, Alternative 4 would not meet the following objectives to the same extent as under the Project and is, thus, considered to be only partially consistent with the following objectives:

- Provide a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural

design, including light materiality, landscape features, and active ground floor uses with open space amenities.

- Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions through such features as a PV solar panel array, electric vehicle charging stations, energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping.
- Fulfill the city's housing goals by expanding student housing opportunities in proximity to open space, public transportation, and a wide range of services and goods.
- Promote sustainable development through the adaptive reuse of an existing seven-story office building into a 593-bed student housing development that includes supportive uses and amenities that promote interaction and communication between students such as large lounge areas and active outdoor recreational areas.
- Promote pedestrian and bicycle safety and access to the Project Site by engaging with the existing dedicated bike throughfare along Pacific Coast Highway with bicycle parking and lockers on the subterranean parking level 1.
- Increase access to alternative transportation options on the Project Site including zip cars and electric scooters. Increase accessibility to the Project Site through a dedicated ride share pick-up and drop-off locations along East Anaheim Street.
- Provide safe student housing through terraced landscape buffers and a security fence and gate.

5.6 Alternatives Considered but Rejected

Section 15126.6(c) of the CEQA Guidelines requires EIRs to describe a reasonable range of alternatives. This includes any alternatives that were considered but ultimately rejected as infeasible. The reason for rejecting these alternatives should be briefly described. Factors to consider in eliminating alternatives from detailed consideration in an EIR include failure to meet most of the basic Project objectives, infeasibility, and inability to avoid significant environmental impacts.

As discussed above, CEQA requires that alternatives evaluated in an EIR be potentially feasible. CEQA defines feasibility as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (Pub. Res. Code Section 21061.1). Section 15126.6(f)(1) of the CEQA Guidelines identifies the factors to be considered when addressing the feasibility of alternatives, including site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to an alternative site. Finally, alternatives that would neither avoid nor substantially lessen any of the significant unavoidable environmental effects of a Project do not need to be evaluated in an EIR.[6] These alternatives can be considered infeasible. Considering these factors, the following alternatives were considered and rejected as infeasible.

[6] *City of Maywood v. Los Angeles Unified School District, (*208 Cal.App.4th 362, 419) (2012).

5.6.1 New Office Tenants Alternative

Redeveloping the Project Site with new office tenants was considered. This alternative would not meet the Project objectives, specifically to adaptively reuse an existing underutilized office building with a student residential building that would help the City meet its RHNA goal and goals and policies outlined in the City of Long Beach General Plan. New office tenants would not address the City's Housing Element goals and increase housing opportunities that would address unique housing needs for special needs residents such as students. Improving the existing Project Site with new office tenants would not fulfill the city's housing goals by expanding student housing opportunities in proximity to open space, public transportation, and a wide range of services and goods. Taking these factors into consideration, an office development alternative was not carried forward for further analysis.

5.6.2 Fewer Units Alternatives

Redeveloping the Project Site with fewer residential units was considered. This alternative would not help to meet the Project's objectives to the same degree as the Project. By providing fewer units and beds, the Project Site would become underutilized and would not allow the City to reach its RHNA goals at the same time as the Project would. Additionally, fewer beds would result in less housing in close proximity to open space, public transportation, and a wide range of services and goods in the City. Taking these factors into consideration, a residential development alternative was not carried forward for further analysis.

5.7 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a Project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "no Project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. Selection of an environmentally superior alternative is based on comparison of the alternatives to determine which among the alternatives would reduce or eliminate the impacts associated with the Project to the greatest degree. The comparative impacts of the Project and the Project Alternatives are summarized in **Table 5-1: Comparison of the Impacts of the Project and Alternatives**.

Of the alternatives analyzed in this Draft EIR, Alternative 1: No Build/No Project, would be considered the environmentally superior alternative because it would not involve new development and assumes that the Project Site would operate under existing conditions. Although Alternative 1 would not meet any of the Project objectives, it would avoid all of the Project's less than significant impacts with mitigation and would have reduced impacts compared to the Project. However, because Alternative 1 has been identified as the environmentally superior alternative, identification of another environmentally superior alternative is required.

Alternative 3, Senior Living and Student Housing, and Alternative 4: Student Housing and Office Space would not include an outdoor pool and therefore would require less construction equipment and result in less vibration during construction. Therefore, Alternative 3, and 4 would result in a less than significant impact to air quality, greenhouse gas emissions, and noise at a lesser degree than the Project.

Alternative 2 would not provide student housing, and therefore, would not provide housing for special needs residents. Additionally, as outlined in the City's General Plan Housing Element, the City's RHNA allocation of housing between October 2021 and October 2029 has an objective of constructing 26,502 new units. The proposed 149 market rate housing units for Alternative 2 would represent approximately 0.6 percent of the number of new units planned to be constructed by the City per the Housing Element. Therefore, Alternative 2 would provide a number of dwelling units similar to the Project and would therefore assist the City in reaching it's RHNA allocations to the same degree as the Project. However, by providing only market rate housing, Alternative 2 would not address all the goals and policies outlined in the City of Long Beach General Plan, including Goal 4 of the Housing Element, which aims to provide housing for special needs residents such as students. Alternative 4 would provide a total of 240 units which would represents 0.9 percent of the anticipated increase for the City by 2050. However, Alternative 4 would only provide 395 beds for students; therefore reducing the number of units available for special needs residents in the City of Long Beach.

Alternative 3 would be considered the environmentally superior alternative because impacts would be similar or less than the Project. Furthermore, Alternative 3 would provide housing for special needs residents in the City including seniors and students as outlined in the City of Long Beach General Plan and would allow the City to reach its RHNA goals. The proposed 290 units for Alternative 3 would represent approximately 1 percent of the number of new units planned to be constructed by the City per the Housing Element. Therefore, Alternative 3 would provide a greater number of units than the Project. However, Alternative 3 does not meet the Project objectives of constructing new student housing near open space, public transportation, and services and goods to the same degree as the Project. Alternative 3 would only provide 395 beds compared to 593-beds for students under the Project.

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TABLE 5-1: COMPARISON OF THE IMPACTS OF THE PROJECT AND ALTERNATIVES

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
AES-1: Would the project have a substantial adverse effect on a scenic vista	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**
AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**
AES-3: Would the project, if in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
AES-4: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
Agriculture and Forestry Resources					
AG-1: Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
the California Resources Agency, to non-agricultural use?					
AG-2: Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**
AG-3: Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**
AG-4: Would the project result in the loss of forest land or conversion of forest land to non-forest use?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**
AG-5: Would the project Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**
Air Quality					
AQ-1: Conflict with or obstruct implementation of applicable air quality plan?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
AQ-2: Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Construction Similar, Operation Less)**	**Less than Significant Impact (Less)**	**Less than Significant Impact (Less)**
AQ-3: Expose sensitive receptors to substantial pollutant concentrations?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Construction Similar, Operation Less)**	**Less than Significant Impact (Less)**	**Less than Significant Impact (Less)**
Air-4: Odors?	**Less than Significant**	**No Impact**	**Less than Significant (Similar)**	**Less than Significant (Similar)**	**Less than Significant (Similar)**
Biological Resources					
BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
BIO-3: Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	**Less Than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar))**	**Less than Significant Impact (Similar)**
BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**
Cultural Resources					
CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	**Less than Significant Impact with Mitigation**	**No Impact**	**Less than Significant Impact with Mitigation (Similar)**	**Less than Significant Impact with Mitigation (Similar)**	**Less than Significant Impact with Mitigation (Similar)**
CUL-3: Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	**Less than Significant Impact with Mitigation**	**No Impact**	**Less than Significant Impact with Mitigation (Similar)**	**Less than Significant Impact with Mitigation (Similar)**	**Less than Significant Impact with Mitigation (Similar)**
Energy					
ENG-1: Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Less)**	**Less than Significant Impact (Less)**	**Less than Significant Impact (Less)**
ENG-2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency??	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
Geology and Soils					
GEO-1: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
GEO-1i: Rapture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.	No Impact	No Impact	No Impact	No Impact	No Impact
GEO-1ii:Strong seismic ground shaking?	Less than Significant Impact	No Impact	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)
GEO-1iii:Seismic-related ground failure including liquefaction?	No Impact	No Impact	No Impact	No Impact	No Impact
GEO-1iv: Landslides	No Impact	No Impact	No Impact	No Impact	No Impact
GEO-2: Result in substantial soil erosion or the loss of topsoil	Less than Significant Impact	No Impact	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)
GEO-3: Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	No Impact	No Impact	No Impact	No Impact	No Impact
GEO-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	No Impact	No Impact	No Impact	No Impact	No Impact

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
GEO-5: Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**
GEO-6: Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	**Less than Significant Impact with Mitigation**	**No Impact**	**Less than Significant Impact with Mitigation (Similar)**	**Less than Significant Impact with Mitigation (Similar)**	**Less than Significant Impact with Mitigation (Similar)**
Greenhouse Gas Emissions					
GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Construction Similar, Operations Less)**	**Less than Significant Impact (Less)**	**Less than Significant Impact (Less)**
GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
Hazards and Hazardous Materials					
HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
involving the release of hazardous materials into the environment?					
HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than Significant Impact	No Impact	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)
HAZ-4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No Impact	No Impact	No Impact	No Impact	No Impact
HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	Less Than Significant Impact	No Impact	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)
HAZ-6: Impair implementation of or physically interfere within an adopted emergency response plan or emergency evacuation plan?	Less than Significant Impact	No Impact	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)
HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildfires?	Less than Significant Impact	No Impact	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)
Hydrology and Water Quality					

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
HWQ-1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
HWQ-2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
HWQ-3a: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar))**
HWQ-3b: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
HWQ-3c: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
HWQ-3d: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
HWQ-4: Would the project if in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**
HWQ-5: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
Land Use and Planning					
LUP-1: Would the project physically divide an established community?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
LUP-2: Would the project 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?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
Mineral Resources					
MIN-1: Would the project result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**
MIN-2: Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**
Noise					
NOI-1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Construction Similar, Operations Less)**	**Less than Significant Impact (Less)**	**Less than Significant Impact (Less)**
NOI-2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?	**Less than Significant**	**No impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Less)**	**Less than Significant Impact (Less)**

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
NOI-3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**
Population and Housing					
POP-1: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
POP-2: Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**
Public Services					
PUB-1: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
performance objectives for fire protection?					
PUB-2: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
PUB-3: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
PUB-4: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
ratios, response times, or other performance objectives for parks?					
PUB-5: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other services?	Less than Significant Impact	No Impact	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)
Recreation					
REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less than Significant Impact	No Impact	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)
REC-2: Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less than Significant Impact	No Impact	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)
Transportation					
TRA-1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation	Less than Significant Impact	No Impact	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
system, including transit, roadway, bicycle and pedestrian facilities?					
TRA-2: Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	Less than Significant Impact	No Impact	Less than Significant Impact (Less)	Less than Significant Impact (Less)	Less than Significant Impact (Less)
TRA-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No Impact	No Impact	No Impact	No Impact	No Impact
TRA-4: Would the project result in inadequate emergency access?	Less than Significant Impact	No Impact	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)	Less than Significant Impact (Similar)
Tribal Cultural Resources					
TCR-1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in	No Impact	No Impact	No Impact	No Impact	No Impact

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
Public Resources Code section 5020.1(k)?					
TCR-2: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.?	**Less than Significant Impact with Mitigation**	**No Impact**	**Less than Significant Impact with Mitigation (Similar)**	**Less than Significant Impact with Mitigation (Similar)**	**Less than Significant Impact with Mitigation (Similar)**
Utilities and Service Systems					
UTI-1: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
UTI-2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
UTI-3: Would the project result in a determination by the wastewater treatment provider which services of may serve the project that is has adequate capacity to serve the project's projected demand in addition to the provider's existing commitment?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
UTI-4: Generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
UTI-5: Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	**Less than Significant Impact**	**No Impact**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**	**Less than Significant Impact (Similar)**
Wildfires					
WF-1: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**
WF-2: Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**

Impact	Project	Alternative 1: No Build/No Project	Alternative 2: Market Rate Housing	Alternative 3: Senior Living and Student Housing	Alternative 4: Student Housing and Office Space
wildfire or the uncontrolled spread of a wildfire?					
WF-3: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**
WF-4: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	**No Impact**	**No Impact**	**No Impact**	**No Impact**	**No Impact**

6. Other CEQA Considerations

This section summarizes the findings of the EIR with respect to irreversible environmental changes; significant and unavoidable environmental impacts; potential secondary effects related to Project mitigation; growth inducing impacts; and effects found to be less than significant.

6.1 Irreversible Environmental Changes

Under CEQA, an EIR must evaluate the extent to which the Project primary and secondary effects would generally commit future generations to the allocation of nonrenewable resources and to irreversible environmental damage. Specifically, CEQA Guidelines section 15126.2(d) states:

> *Uses of nonrenewable sources during the initial and continued phase of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

The Project would necessarily consume limited, slowly renewable, and nonrenewable sources, resulting in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources for electricity, natural gas, and transportation, and the associated impacts related to air quality and greenhouse gas emissions.

Environmental Hazards

The Project's potential use and treatment of hazardous materials is addressed in **Section 4.7. Hazards and Hazardous Materials**. As described in **Section 4.7**, the Project Site is currently developed with an approximately 120,000 sf office building with three subterranean levels of parking, surface parking lot, and associated landscape. The Project Site reconnaissance consisted as part of the Phase I ESA included of an inspection of the Project Site and a perimeter survey of the surrounding properties in compliance with American Society for Testing and Materials (ASTM) standards. The survey identified potential sources of environmental concern including a cooling water treatment container, electrical equipment containing PCBs, self-luminescent tritium exit signs, the sump, and the underground water storage tank. However, these items were found to appear in working order with no signs of staining or leaking or hazardous substances, and none of these items are expected to represent a significant environmental condition.

Project construction would include grading and export of minor amounts of construction debris. Construction activity would comply with SCAQMD Rule 403, addressing fugitive dust sources, Rule 1166 addressing VOC emissions from excavating, grading, handling, and treating VOC-contaminated soil, and Rule 1466, requiring minimization of off-site fugitive dust emissions from earth-moving activities at sites containing specific toxic air contaminants. Compliance with the regulatory requirements associated with Project construction and the requirements of the NPDES

Construction General Permit would reduce impacts to less than significant during Project construction activities. Project operations would likely involve uses employing common maintenance and janitorial supplies, such as cleaners and solvents, paints and thinners for Project Site maintenance, herbicides and pesticides for landscaping, and other common chemicals. The limited quantities and nature of chemicals use by the Project would not be considered significant. The use of these materials would be in accordance with the manufacturers' specifications for use, storage, and disposal of such products which have been formulated to avoid substantial exposure hazards. Compliance with applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential to release contaminants. Compliance with regulations and standards would serve to protect against significant and irreversible environmental changes that could result from the accidental release of hazardous materials.

Building Materials and Solid Waste

Construction of the Project would require the consumption of resources that do not replenish themselves or which may renew so slowly as to be considered nonrenewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt, metals, and petrochemical construction materials. However, the Project would be an adaptive reuse of the existing building; therefore, new materials would be less than typically used in new construction. During construction and operation, the Project would comply with California Solid Waste Reuse and Recycling Access Act (AB 1327), which requires the adequate and accessible areas for the collection and loading of recycling materials. Additionally, the LBMC Chapter 8.60, establishes standards and guidelines regarding the refuse and recycling receptables for removing and conveying waste, which would be adhered to by the Project during operation. The Project would also comply with LBMC Chapter 18.67 which provides regulations for the City's construction and demolition (C&D) recycling program and requires all projects to divert at least 65 percent of all C&D materials to recycling. Thus, the consumption of nonrenewable building materials, such as lumber, aggregate materials, and plastics would be reduced.

Water

Water usage during construction and operation of the Project is presented in **Section 4.8, Hydrology and Water Quality** of this Draft EIR. As discussed, construction activities associated with the Project would require minimal excavation and grading. Project construction activities would require short-term and minimal construction-related water needs, and therefore would not substantially increase water consumption. Operational water demands associated with the Project would not adversely affect groundwater supply. Furthermore, the Project would not include the construction of any water supply wells, nor would the Project impact any existing water supply wells. Therefore, the Project would not substantially deplete groundwater supplies nor interfere substantially with groundwater recharge. Additionally, the Project is within the jurisdiction of the LA RQCB Basin Plan, which identifies beneficial uses for surface water and groundwater and establishes water quality objectives to attain those beneficial uses. The Project would also comply with the City of Long Beach's Stormwater and Runoff Pollution Control Ordinance, as well as the current MS4 permit. Therefore, the Project would not conflict with or obstruct water quality control plans, and impacts would be less than significant. As such, while Project operation would result in the irreversible consumption of water, the Project would result in less than significant impact related to water supply and construction and operation of the Project would be consistent with federal, State, and local requirements.

Energy Consumption

Project consumption of nonrenewable fossil fuel for energy use during construction and operation of the Project is addressed in **Section 4.4, Energy**. During construction, energy consumed would be minimal, as typical demand would stem from the use of electrically powered hand tools during the hours of construction activities. The energy associated with Project construction includes electricity use associated with water utilized for dust control, diesel fuel from on-road hauling trips, vendor trips, and off-road construction diesel equipment, as well as gasoline fuel from on-road worker commute trips. Construction activities would not require natural gas; therefore, there would be minimal energy demand generated by construction. Project operations would include energy consumption associated with building energy use (electricity and natural gas), water use, and transportation-related fuel use. Energy consumed during operations would be less than SCE's forecasted energy demand, thus the Project would result in a negligible demand compared to SCE's overall demand. Therefore, the Project would result in a less than significant impact associated with energy consumption.

Conclusion

As discussed above, the Project would require renewable and nonrenewable resources during the construction and operation of the Project. This would in effect limit the availability of these resources and the Project's building site for future generations or for other uses during the life of the Project. Furthermore, the Project would be LEED certified, and would reduce the consumption on nonrenewable sources when considered in a larger context. In addition to this, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area. Additionally, the Project would require the use of common maintenance and janitorial supplies, such as cleaners and solvents, paints and thinners for Project Site maintenance, herbicides and pesticides for landscaping, and other common chemicals during construction and operations. Compliance with regulations and standards would serve to protect against significant and irreversible environmental changes that could result from the accidental release of hazardous materials. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant.

6.2 Potential Secondary Effects

CEQA Guidelines 15126.4(a)(1)(d) says that:

> *A mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed.*

As described in the CEQA Guidelines Section, the potential impacts which could result from the implementation of each mitigation measure proposed as part of the Project was reviewed. The following provides a summary of the potential secondary impacts that might occur as a result of the implementation of the proposed mitigation measures, for those environmental issue areas where mitigation is provided.

Cultural Resources

Mitigation Measure CUL-1, Inadvertent Discovery of Cultural Resources: In the event that any subsurface cultural resources are encountered at the Project Site during construction or the

course of any ground disturbance activities, all such activities within 50 feet of the discovery shall halt immediately. The applicant shall notify the City and consult with a Secretary of Interior qualified archaeologist who shall evaluate the find in accordance with federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. For any resources of Native American origin, the City shall also contact the Tribes that elected to consult on the Project to identify its potential as a Tribal Cultural Resource (TCR). Should the resource, in consultation between the City and Tribe(s), be determined a TCR, the City shall also consult with Tribes regarding avoidance or other measures recommended by the consultant. All identified cultural resources will be recorded on appropriate CA DPR 523 series forms and evaluated for significance. All records will be submitted to the City of Long Beach, Consulting Tribe(s), and South-Central Coastal Information Center (SCCIC).

Mitigation Measure CUL-2, Inadvertent Discovery of Human Remains: If human remains are encountered during the undertaking, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.

With the implementation of these mitigation measures, disturbance of cultural resources would be reduced and would not result in adverse secondary impacts.

Geology and Soils

Mitigation Measure GEO-1, Paleontological Monitoring: In the event paleontological resources are encountered during construction of the Project, the City shall be immediately informed of the discovery. All work shall cease in the area of the find, and a qualified paleontologist shall be retained by the Applicant to evaluate the find before restarting work in the area. A qualified paleontologist is a paleontologist who meets the Society of Vertebrate Paleontology (SVP) standards for Qualified Professional Paleontologist, which is defined as an individual preferably with an M.S. or Ph.D. in paleontology or geology, who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California (preferably Southern California), and who has worked as a paleontological mitigation Project supervisor for a least one year. The City shall require that all paleontological resources identified on the Project Site be assessed and treated in a manner determined by the qualified paleontologist. The qualified paleontologist shall be empowered to halt or divert ground disturbing activities.

Mitigation Measure GEO-2, Paleontological Documentation: Fossil remains collected during the monitoring process will be salvaged and will be cleaned, repaired, sorted, and catalogued. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, will be deposited (as a donation) in a scientific institution with permanent paleontological collections located within the County (or, if no repository is available, adjacent Counties). A final data recovery report will be completed by a qualified paleontologist. This report will include discussions of the methods

used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils. The report will be submitted to the Lead Agency upon completion.

With the implementation of these mitigation measures, disturbance of paleontological resources would be reduced and would not result in adverse secondary impacts.

Tribal Cultural Resources

Mitigation Measure TCR-1, Retain a Native American Monitor Prior to Commencement of Ground Disturbing Activities: The Project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

With the implementation of this mitigation measure, disturbance of tribal cultural resources would be reduced and would not result in adverse secondary impacts.

6.3 Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(d) requires an EIR to discuss the ways a project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. According to CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a wastewater treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring the construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines state that it must not be assumed that growth in and area is necessarily beneficial, detrimental, or of little significance to the environment. Growth can be induced as follows:

- Direct growth associated with a project;
- Indirect growth created by either the demand not satisfied by a project or the creation of surplus infrastructure not utilized by a project.

The Project would adaptively reuse a seven-story office building with three levels of subterranean parking into a private dormitory (housing for students) with 149 student residential suites (593 beds). The Project would introduce a new residential population to the area. According to the State of California's Department of Finance (DOF), the population of Los Angeles County has decreased from 10,014,009 in 2020 to 9,824,091 as of January 1, 2024. SCAG estimates that the

population of Los Angeles County will increase to 10,793,000 persons in 2050.[1] As of January 1, 2024, the population of the City was 458,813 people.

Project construction would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate to the Project area as a consequence of working on the Project, and therefore, new permanent residents would not be generated during Project Construction.

As described in **Section 4.11, Population and Housing**, the Southern California Association of Governments' (SCAG) 2024 RTP/SCS indicates that the City's population would increase from 467,900 in 2019 to 474,099 in 2026. The Project's anticipated population growth (593 persons) would represent approximately 9.6 percent of the City's anticipated growth between 2019 and 2026, and approximately 2.2 percent of the City's anticipated growth between 2019 and 2050. Thus, the Project's estimated population growth would be within regional growth projections for the City.

Additionally, the Project's anticipated household growth (149 beds) would represent approximately 2.4 percent of the City's anticipated household growth between 2019 and 2026, and approximately 0.5 percent of the City's anticipated household growth between 2019 and 2050. Thus, the Project's estimated household growth would be within regional growth projections for the City.

The estimated projected number of households for the City in the year 2026, the Project's buildout year, was interpolated from the household estimates for the years 2019 and 2050 from the 2024 RTP/SCS. The City would anticipate a growth in the City's number of households from 169,300 in 2019 to 175,623 in 2026 representing an increase of 28,000 households. the Project would include 149 units, which represents 0.5 percent of the anticipated increase for the City by 2050. Additionally, as mentioned above, and as outlined in the City's General Plan Housing Element, the City's RNHA allocation of housing between October 2021 and October 2029 has an objective of constructing 26,502 new units. The Project's 149 student residential suites would represent approximately 0.6 percent of the number of new units planned to be constructed by the City per the Housing Element. Therefore, operation of the Project would not induce substantial unplanned population growth in the Project area, either directly or indirectly and would not exceed regional or local growth projections.

With regard to employment, it is anticipated that construction workers and future employees of the Project would reside within the City and surround area, and commute to work. Therefore, the Project would not cause exceedance of SCAG's employment projections. Furthermore, the Project would not include components such as the extension of roads or existing infrastructure that would result in the indirect population growth within the City. Overall, the Project would be consistent with SCAG's 2024 RTP/SCS and growth inducing impacts would be less than significant.

[1] State of California Department of Finance (DOF), E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2024, https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/. Accessed August 20, 2024.

6.4 Significant and Unavoidable Impacts

CEQA Guidelines Section 15126.2(b) requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less-than-significant level. As determined throughout **Chapter 4, *Environmental Analysis***, of this Draft EIR, the Project's potential significant impacts identified are all addressed through mitigation measures that reduce impacts to less than significant levels. Accordingly, the Project would not have significant and unavoidable impacts.

6.5 Impacts Found Not to be Significant

The City conducted an Initial study which was circulated beginning on August 12, 2024 and concluding on September 13, 3034 to determine the Project's significant effects. In the course of this evaluation, certain impacts of the Project were found to be less than significant due to the inability of a project of this scope to create such impacts or the absence of Project characteristics producing effects of this type. The effects determined not to be significant are not required to be included in the primary analysis section of the Draft EIR. In accordance with *CEQA Guidelines Section 15128,* the following discussion provides a brief description of potential impacts found to be less than significant. A copy of the Initial Study is included in **Appendix A.**

Aesthetics

AES 1 Would the Project have a substantial adverse effect on a scenic vista?

No Impact. A scenic vista is commonly defined as a viewpoint that provides expansive views of a highly valued landscape for the public's benefit. The Urban Design Element of the City of Long Beach General Plan identifies several important vistas in the City, including views of downtown Long Beach from mid-City, views from Los Cerritos Park, views across the Long Beach Skyline, the view along Alamitos Avenue south to the Villa Riviera Hotel; views within El Dorado Park; the view down 3rd Street to the cranes at the Port of Long Beach; views along Ocean Boulevard; the view from Bluff Park to the Pacific Ocean and Belmont Pier; the view from Queensway Bay and Shoreline Park to the Queen Mary; and the view from Los Coyotes Drive to the San Gabriel Mountains.[2] The Urban Design Element also identifies scenic routes. Currently, Ocean Boulevard and Livingston Drive constitute City-designated scenic routes, located approximately 1.87 miles south and 1.9 miles south of the Project Site, respectively. By 2030, the City-designated system of scenic routes will be expanded to include Ocean Boulevard on the Belmont Peninsula, the Promenade in downtown Long Beach, the Los Angeles River and San Gabriel River corridors, Appian Way along the Colorado Lagoon, Marine Stadium, Studebaker Road, the approach road to Rancho Los Cerritos, and the entire stretch of Pacific Coast Highway.[3]

The Project is not situated in one of the areas with scenic vistas or along a scenic route as identified in the City's General Plan. The Project would involve the adaptive reuse of a seven-story office building with three levels of subterranean parking into student housing in a highly urbanized area, surrounded by existing development.

The height of the existing building would remain the same under the Project. The exterior of the building would largely remain the same. Minor additions such as decorative window films, identification signage, a small pavilion building, improvements to the ground level entryways, and

[2] City of Long Beach, *City of Long Beach General Plan 2040*, Urban Design Element, December 2019.
[3] *Id.*

inclusion of new open space areas would not substantially add to the existing building's massing or scale, nor would they increase the building's height resulting in new impacts to scenic vistas. Accordingly, the Project would not have an adverse effect on a scenic vista. No impact would occur.

AES-2 Would the Project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?

No Impact. The Project Site faces Pacific Coast Highway to the north and east. Pacific Coast Highway is currently not designated as a scenic highway by Caltrans.[4] However, according to the Urban Design Element, the entire stretch of the Pacific Coast Highway will become a scenic highway by 2030.[5] The nearest eligible State Scenic Highway is a segment of California State Route 91 that is located approximately 18.04 miles east of the Project Site.[6] As discussed above, the Project involves the adaptive reuse of the existing office building into new student housing and minor changes to the building façade would not substantially add to the existing building's massing or scale, nor would increase the building's height. Accordingly, the Project would have no impact on scenic resources within a State Scenic Highway.

AES-3 If in a non-urbanized area, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The Project is in a highly urbanized area surrounded by developed office, residential, and commercial uses. The Project would adaptively reuse an existing seven-story office building and transform it into student housing. The Project is proposing a General Plan Amendment from the current Community Commercial (CC) Placetype to the Neighborhood Serving Center or Corridor (NSC-Moderate) Placetype which would permit residential uses. The Project would also require a Zoning Code Amendment/Map Change to change the existing zone from Community Commercial Automobile-Oriented (CCA) to Mixed-Use (MU-3) to allow for the Project's student residential uses and to enable adaptive reuse development standards.

The Project would be consistent with the development standards and regulations of the MU-3 Zoning District, upon approval of the Zoning Amendment, including standards governing scenic quality, including building height, residential density, and FAR. As the Project would comply with the required standards and other applicable local regulations pertaining to visual quality, the Project would not conflict with applicable zoning and local regulations governing scenic quality and impacts on scenic quality would be less than significant.

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[4] California Department of Transportation (Caltrans). *California State Scenic Highway System Map*. Available at https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed March 19, 2024.

[5] City of Long Beach (2019). General Plan Urban Design Element. p.15 Available at https://www.longbeach.gov/globalassets/lbcd/media-library/documents/planning/advance/lueude/urban-design-element-final-adopted-december-2019

[6] California Department of Transportation (Caltrans). California State Scenic Highway System Map. Available at https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed March 19, 2024.

AES-4 Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The Project Site is located in a highly urbanized area with existing sources of light. Existing outdoor lighting in areas around the Project Site includes street lighting along Pacific Coast Highway, Anaheim Street, Clark Avenue, and lighting from surrounding residential, office, and commercial buildings. The existing building includes lighting within entryways, parking areas, and light emitting from interior office uses. The Project would include new sources of exterior lighting on the Project Site from the new amenity and open spaces uses as well as in the surrounding landscaped areas. At night, interior lighting would also emanate from windows in the adaptively reused building.

As the Project is situated in an urban area that is already well illuminated, lighting from the Project would be similar to existing conditions in areas surrounding the Project Site. While the Project would introduce new light sources related to new open space, amenity areas, and more active residential uses, lighting developed as part of the Project would be required to comply with LBMC Chapter 22.30.110, *Lighting Design for Safety*. As required, lighting is required to be directed and shielded to prevent light and glare from intruding onto adjacent sites, and light standards are not to exceed the building height and be appropriately spaced from adjacent property lines. Therefore, nighttime views in the area would not be affected by light generated by the Project.

Glare can be caused by the reflection of sunlight or artificial light from finished surfaces like window glass or other reflective materials. As mentioned previously, the exterior of the building would largely remain the same. Minor additions such as decorative window films, identification signage, a small pavilion building, improvements to the ground level entryways, and open space areas would not involve the use of highly reflective materials known to cause such glare. Therefore, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and impacts would be less than significant.

Agricultural and Forestry Resources

AG-1 Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

AG-2 Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

AG-3 Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Code § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?

AG-4 Would the project result in the loss of forest land or conversion of forest land to non-forest use?

AG-5 Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. While small areas of Unique Farmland are mapped within the City, no Prime Farmland or Farmland of Statewide or Local Importance are present. The Project Site is in an area primarily

composed of Urban and Built-Up Land.[7] The closest area of Prime Farmland to the Project Site is located approximately 3.96 miles to the southeast. There are no lands subject to a Williamson Act Contract within the City.[8] The Project Site does not include agriculture, forest land, or timberland among its permitted uses. While agriculture is included as a permitted use in some of the City's zoning districts, the City's zoning ordinance does not include agriculture as a permitted use in the CCA Zoning District, nor does it provide zoning for agricultural, forest land, or timberland land uses.

Accordingly, the Project would have no potential to convert farmlands to nonagricultural use, would not conflict with zoning for agricultural use or any Williamson Act contracts, would not conflict with forest land or timberland zoning, result in the loss of forest land, or the conversion of farmland or forest land to non-agricultural or non-forestland use, and no impact would occur.

Air Quality

AQ-4 Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. During construction-related activities, some odors (not substantial pollutant concentrations) that the public may detect are those typical of construction vehicles (e.g., diesel exhaust from grading and construction equipment). These odors are a temporary short-term impact, which are typical of construction projects and disperse rapidly.

The SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. These land uses include agriculture, wastewater treatment plant, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project is a residential building for students and does not propose to include any odor-inducing uses on the Project Site. Therefore, the Project would result in a less than significant impact related to other emissions leading to odors adversely affecting a substantial number of people.

Biological Resources

BIO-1 Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant Impact. Review of the U.S. Fish and Wildlife Service's (USFWS's) Information for Planning and Consultation (IPaC) database identifies four listed species and one candidate species with likelihood to occur in the environs of the Project Site. The four listed species are Pacific Pocket Mouse (*Perognathus longimembris pacificus*) and California Least Tern Sterna (*antillarum browni*), Southwestern Pond Turtle (*Actinemys pallida*), and the Western Spadefoot (*Spea hammondii*). The candidate species is Monarch Butterfly (*Danaus plexippus*). Critical habitat has not been identified for any of these species. The Project Site is located outside the range for the Pacific Pocket Mouse, California Least Tern, Southwestern Pond Turtle, and the Western Spadefoot. While within the range of the Monarch Butterfly, the Project Site is highly disturbed and largely devoid of vegetation that would support the Monarch Butterfly.

[7] California Department of Conservation. (2016). *California Important Farmland Finder.* Available at https://maps.conservation.ca.gov/dlrp/ciff/. Accessed March 18, 2024.

[8] California Department of Conservation. (2016). *Williamson Act/Land Conservation Act.* Available at http://www.conservation.ca.gov/dlrp/lca. Accessed March 18, 2024.

The California Department of Fish and Wildlife's (CDFW's) California Natural Diversity Database (CNDDB) identifies nine State species of special concern with potential for occurrence in the Long Beach quadrangle. **Table 6-1: California Special-Status Species Known to Occur in the Long Beach Area** below identifies these species.

Table 6-1: California Special-Status Species Known to Occur in the Long Beach Area

Category	Common Name	Scientific Name	State Status
Animals – Birds	western yellow-billed cuckoo	*Coccyzus americanus occidentalis*	Endangered
Animals – Birds	bank swallow	*Riparia riparia*	Threatened
Animals – Birds	California least tern	*Sternula antillarum browni*	Endangered
Animals – Birds	Belding's savannah sparrow	*Passerculus sandwichensis beldingi*	Endangered
Animals – Fish	steelhead – southern California DPS	*Oncorhynchus mykiss irideus pop. 10*	Candidate Endangered
Animals – Insects	Crotch bumble bee	*Bombus crotchii*	Candidate Endangered
Plants – Vascular	Lyons pentachaeta	*Pentachaeta lyonii*	Endangered
Plants – Vascular	salt marsh birds-beak	*Chloropyron maritimum ssp. Maritimum*	Endangered
Plants – Vascular	California Orcutt grass	*Orcuttia californica*	Endangered

Source: CNNDB QuickView. Available at https://apps.wildlife.ca.gov/bios6/?tool=cnddbqv. Accessed March 18, 2024.

The potential for finding any of these species on the Project Site or in areas around the Project Site is very low because the Project Site is highly disturbed and located in an urbanized area. It is unlikely that the Project Site would support these species or their habitats. Accordingly, the Project would not have a substantial adverse effect on any species identified as a candidate, sensitive, or special-status species in local and regional plans, policies, or regulations, or by the CDFW or USFWS. Impacts would be less than significant.

BIO-2 Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

BIO-3 Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant Impact. The Project Site is highly disturbed and located in an urbanized area. There are no wetlands, sensitive natural communities, or riparian habitats found on or near the Project Site. The nearest wetland (freshwater pond) is found at the Colorado Lagoon located

adjacent to the Recreation Park Golf Course 18 approximately 0.68-mile south of the Project Site.[9] Therefore, impacts on riparian habitat, sensitive natural communities, and wetland habitat would be less than significant.

BIO-4 Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. The Project Site is in a highly urbanized environment with minimal existing landscaping, is surrounded by existing development, and is not part of an established wildlife corridor. Project development would occur within the Project Site and would not impact the movement of any native wildlife species. The Project Site contains ornamental landscaping, trees along Clark Avenue and Pacific Coast Highway, and a sparsely landscaped open space area. It is unlikely that the ornamental landscaping on-site would provide suitable habitat for any native resident or wildlife species. However, the existing trees may provide habitat for nesting birds. Most bird nests and eggs are protected under the California Fish and Game Code (CFGC) Section 3503 and the Migratory Bird Treaty Act (MBTA). Project construction activities and tree maintenance activities should occur outside of the general avian breeding season of February 1st to through August 31st to the extent feasible. If Project-related construction, demolition, and tree maintenance activities cannot occur outside of the general avian breeding season (February 1st to through August 31st), a pre-activity nesting bird survey shall be conducted prior to the onset of the aforementioned activities, within a maximum of 14 days prior to commencement. The survey shall be conducted by a qualified biologist. The survey shall be conducted within all suitable nesting habitat located within the area of activity, which includes a 250-foot survey buffer around the activity site to account for all potentially nesting birds on and in the immediate vicinity. If no nesting birds are found, the Project-related activities may commence without potential impacts to nesting birds. Therefore, with compliance with CGFC Section 3503 and the MBTA, the Project would have a less than significant impact on the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

BIO-5 Would the Project conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. The Project Site is located in an urbanized area and is highly disturbed with minimal vegetation. The Project would not affect any protected biological resources. The existing tree located on Clark Avenue would be preserved. There are currently four street trees located on the periphery of the Project Site along Pacific Coast Highway. These trees would not be removed as part of the Project. The City does not have a tree preservation policy or ordinance; however, LBMC Chapter 14.28 regulates and controls the planting, maintenance, and removal of trees on City streets. Any trees to be removed by the Project would be subject to LBMC Chapter 14.28 Additionally, the Project would be required to comply with CFGC Section 3503 and the MBTA to ensure that no significant impacts to nesting birds would occur due to the Project's potential removal of any existing trees.

Accordingly, the Project would not conflict with local policies or ordinances protecting biological resources, and impacts would be less than significant.

[9] United States Fish and Wildlife. *National Wetlands Inventory*. Available at https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed March 18, 2024.

BIO-6 Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project Site not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Accordingly, there would be no impact.

Cultural Resources

CUL-1 Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

No Impact. The Project Site is currently developed with a seven-story office building constructed in 1981. The existing office building is not listed in the National Register of Historic Places or California Register of Historical Resources. Furthermore, the Project involves the adaptive reuse of the existing building and improvements to the exterior of the building would remain largely the same under existing conditions. Accordingly, the Project would not cause a substantial adverse change in the significance of a historical resource, and no impact would occur.

Geology and Soils

GEO-1i Would the Project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to establish regulatory zones, known as "Alquist Priolo Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). No Holocene-active faults are known to cross the Project Site, and the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. The closest Holocene-active faults are the Reservoir Hill Fault, located approximately 0.13 miles west of the Project Site, and the Northeast Flank Fault, located approximately 2 miles northwest of the Project Site. The nearest Alquist-Priolo Earthquake Fault Zone is the Long Beach Earthquake Fault Zone, located 0.05 miles west of the Project Site. Therefore, the Project would not expose people or structures to adverse effects involving rupture of a known earthquake fault, and no impact would occur.

GEO-1ii Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking?

Less than Significant Impact. The Project Site's location in Southern California is characterized by high regional seismicity and there are numerous active faults in the region as described above. The proximity of these faults places the Project area at potential risk for seismic hazards including

strong seismic ground shaking. The Project would involve the adaptive reuse of an existing office building. While the Project Site is located in the highly seismic Southern California region, development in the City is required to adhere to the California Building Standards Code (California Code of Regulations, Title 24) and the Uniform Building Code (UBC), as stated in LBMC Chapter 18.68, Earthquake Hazard Regulations. Therefore, the Project would not directly or indirectly cause potential adverse effects involving seismic ground shaking, and a less than significant impact would occur.

GEO-1iii Would the Project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving seismic-related ground failure, including liquefaction?

No Impact. The Project Site's location in Southern California is characterized by high regional seismicity and there are numerous active faults in the region. The proximity of these faults places the Project area at potential risk for seismic hazards including strong seismic ground shaking and soil liquefaction. However, the Project is not located within a Liquefaction zone.[10] Moreover, the Project will involve the adaptive reuse of an existing building and minimal excavation will be required. The Project would be required to adhere to the California Building Standards Code (California Code of Regulations, Title 24) and the Uniform Building Code (UBC) as stated in the LBMC Chapter 18.40. Therefore, the Project would not directly or indirectly cause potential adverse effects involving liquefaction, and there would be no impact.

GEO-1iv Would the Project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving landslides?

No Impact. Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. The Project Site is neither within an Earthquake Induced Landslide Zone nor is it in a location conducive to landslides. Therefore, the Project would not directly or indirectly cause potential adverse effects involving landslides, and there would be no impact.

GEO-2 Would the Project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project would adaptively reuse an existing building and would require minimal grading and earthwork activities. Therefore, the Project would not result in substantial soil erosion or the loss of topsoil and there would be less than significant impacts.

GEO-3 Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

No Impact. The Project is not located in an active fault zone, liquefaction zone, or landslide zone. Therefore, there would be no impact associated with lateral spreading, liquefaction, or collapse if the Project is located on a geologic unit or soil that is unstable.

[10] California Geological Survey. California State Geoportal Seismic Hazards Program: Liquefaction Zones. Available at https://gis.data.ca.gov/datasets/b70a766a60ad4c0688babdd47497dbad_0/explore?location=33.784407%2C-118.135003%2C17.59. Accessed March 27, 2024.

GEO-4 Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

No Impact. Expansive soils typically feature high percentages of clay with a capacity for holding large amounts of water and can frequently be identified by determining the level of soil plasticity. High levels of plasticity are associated with the ability of the soil mineral content to absorb water. A significant impact could occur if the development is constructed on soils that are expansive or have high plasticity. According to the Conservation Element of the General Plan, the Project is in an area composed of Tujuna fine sand, which is characterized by gray or brownish-gray loose sand.[11]

Furthermore, according to the Phase I Environmental Site Assessment Report (ESA) located in **Appendix E**, the Project Site's soils are comprised of Urban Land Thums-Windfetch Complex. Urban Land Soils are described as terraces with very high runoff; the Thums soils are described as well-drained clay loan and clay with medium runoff; and the Windfetch soils are described as well-drained loam and clay loam with low runoff.[12] Therefore, the Project would not be located on expansive soil due to the low percentages of clay. The Project would adaptively reuse an existing seven-story office building; therefore, the Project would result in minimal Project construction and would not impact undeveloped areas with issues related to expansive soils.

GEO-5 Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The Project's wastewater would discharge to the local sanitary sewer line for conveyance to a sewer system. Accordingly, the Project would not utilize septic tanks or alternative wastewater disposal systems, and there would be no impact.

Hazards and Hazardous Materials

HAZ-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The closest school is the Woodrow Wilson High School, located approximately 0.45 mile southwest from the Project Site, at 4400 East 10th Street. No truck routes are located adjacent to Woodrow Wilson High School. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant.

HAZ-4 Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the California Department of Toxic Substances Control (DTSC). According to the Phase I ESA, historical uses on the Project Site

[11] City of Long Beach. (1973). *Conservation Element.* Available at https://www.longbeach.gov/globalassets/lbcd/media-library/documents/planning/advance/general-plan/1973-conservation-element. Accessed March 21, 2024.
[12] Citadel EHS. (2024). Phase I Environmental Site Assessment Report Park Tower 5150 East Pacific Coast Highway Long Beach, CA.

include a gas station, restaurant, and car wash uses.[13] Furthermore, according to the Phase I ESA, the Project Site is not listed on the Department of Toxic Substances Control (DTSC) Cortese List. The DTSC Cortese List only lists one site in the City of Long Beach, located in the San PedroBasin between the coast of Catalina Island and Long Beach. [14] Therefore, there would be no impacts related to hazardous materials.

HAZ-G Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less than Significant Impact. According to the State of California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone Map, the Project Site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) for the State Responsibility Area (SRA) or the Local Responsibility Area (LRA).[15,16] The nearest VHFHSZ in the SRA is located approximately 16 miles northeast of the Project Site in Brea. The nearest VHFHSZ in the LRA map is located approximately 10 miles west of the Project Site in Rolling Hills Estates.

Hydrology and Water Quality

HWQ-4 Would the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

No Impact. The Project Site is located in an area of minimal flood hazard, outside the 100-year floodplain,[17] outside the tsunami hazard area,[18] not within a dam inundation zone,[19] and is not within a seiche zone. The Project would not result in a release of pollutants due to Project inundation. Accordingly, there would be no impact.

Land Use and Planning

LUP-1 Would the Project physically divide an established community?

No Impact. Examples of projects that could physically divide an established community include new freeways or highways that traverse an established neighborhood. The Project Site is currently in an urban setting surrounded by existing development. The Project involves the adaptive reuse of an existing seven-story office building that would be adaptively reused to accommodate student housing. Therefore, the Project would not physically divide an established community, and no impact would occur.

[13] Citadel EHS. (2024). Phase I Environmental Site Assessment Report Park Tower 5150 East Pacific Coast Highway Long Beach, CA.
[14] California Department of Toxic Substances Control. DTSC's Hazardous Waste and Substances Site List- Site Cleanup (Cortese List). Available at https://dtsc.ca.gov/dtscs-cortese-list/. Accessed May 3, 2024.
[15] California Department of Forestry and Fire Protection. (2022). *Los Angeles County State Responsibility Area Fire Hazard Severity Zones*. Available at https://osfm.fire.ca.gov/media/cuxnqmcw/fhsz_county_sra_11x17_2022_losangeles_ada.pdf. Accessed March 20, 2024.
[16] California Department of Forestry and Fire Protection. (2007). *Very High Fire Hazard Severity Zones in LRA – Los Angeles*. Available at https://osfm.fire.ca.gov/media/5830/los_angeles.pdf. Accessed March 20, 2024.
[17] Federal Emergency Management Agency. FEMA Flood Map Service Center. Available at https://msc.fema.gov/portal/home. Accessed March 21, 2024.
[18] California Department of Conservation. Tsunami Hazard Area Map. Available at https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13228059.8424%2C3969141.1141%2C-13085504.7847%2C4040151.1134%2C102100&utm_source=cgs%2Bpassive&utm_content=statewide. Accessed March 21, 2024.
[19] California Department of Water Resources. Dam Breach Inundation Map Web Publisher. Available at https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2. Accessed March 21, 2024.

Mineral Resources

MIN-1 Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

MIN-2 Would the Project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The Phase I ESA prepared for the Project identified an oil well located approximately 625 feet east of the Project Site that is inactive and plugged. The well was drilled to a depth of 10,280 feet in October 1945 and was abandoned by November 1945.

Per Special Report 209, *Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California* (2010), the Project Site is in an area designated as Mineral Resource Zone (MRZ) 3. MRZ-3 pertains to areas of undetermined mineral resource significance. The nearest mine, the R.J. Noble Company Mine, is an open pit sand and gravel mine approximately 16 miles east of the Project Site. The mine is currently idle and under reclamation.[20]

Mining or mineral extraction has not historically occurred on the Project Site. The Project would not result in the loss of availability of a known mineral resource of value to the region and the residents of the state, nor would it result in the loss of availability of a locally important mineral resource recovery site and there would be no impact.

Population and Housing

POP-2 Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project would not displace existing housing or require construction of replacement housing elsewhere as no housing is currently located on the Project Site.

Public Services

PUB -1 Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

Less Than Significant Impact. The City of Long Beach Fire Department (LBFD) operates 23 fire stations throughout the City. Three fire stations are located within 1 mile of the Project Site: LBFD Station 4 at 411 Loma Avenue LBFD Station 14 at 5200 East Elliot Street, and LBFD Station 17 at 2247 Argonne Avenue, located approximately 1.2- miles southwest, 0.95-mile south, and 1.2-miles southwest of the Project Site, respectively.

The LBFD responded to approximately 80,000 calls in 2022. In February 2022, the latest month for which data was available, the LBFD made 4,981 calls; however, 4,180 (84 percent) of those

[20] California Department of Conservation Division of Mine Reclamation. Mines Online. Available at https://maps.conservation.ca.gov/mol/index.html. Accessed March 18, 2024.

calls were for medical service, and 587 (12 percent) of calls made for fire protection.[21] In fiscal year 2022, the LBFD arrived on scene within six minutes for approximately 33.8 percent of emergency calls.[22]

The Project would adaptively reuse an existing seven-story office building and introduce housing for students which could incrementally increase demand for fire protection services. Therefore, there is potential for an increase in service calls to the LBFD due to an increase in student residents on the Project Site. However, according to LBMC Section 28.16.050 *Fire Facilities Impact Fee* all residential and nonresidential developments would be required to pay a Fire Facilities Impact Fee to support a potential for an increase in need for fire protection services. Impacts associated with fire protection services would be less than significant.

PUB-2 Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

Less Than Significant Impact. The City of Long Beach Police Department (LBPD) operates four patrol division stations: North, East, South, and West Patrol Division stations. The East Patrol Division Station is located at 3800 East Willow Street, approximately 1.5 miles northwest of the Project Site.

In 2022, the LBPD responded to approximately 210,000 service calls. Patrol officers respond to calls for service and emergencies. Call types range from Priority 1 calls such as shootings and violent crime to Priority 3 such as nonviolent 991 calls that are primarily requests for a crime report.[23] The average response time for Priority One calls was 5.1 minutes.[24] The Project would adaptively reuse an existing office building into new student residential uses that would include 593 beds which could incrementally increase demand for fire protection services. However, all new residential and nonresidential developments would be required to comply with LBMC Section 18.15.060 and pay a Police Facilities Impact Fee to support a potential for an increase in need for police protection services. Impacts associated with police protection services would be less than significant.

PUB-3 Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?

The Project Site is within the boundaries of the Long Beach Unified School District (LBUSD), which serves public school needs for the City of Long Beach, as well as the cities of Signal Hill,

[21] City of Long Beach. Fire Department Calls for Service. February 2022. Available at https://www.longbeach.gov/globalassets/fire/media-library/documents/news/calls-for-service-february2022-combined. Accessed March 20, 2024.
[22] City of Long Beach. Fiscal Year 2022 Annual Report. March 2023. Available at https://www.longbeach.gov/globalassets/finance/media-library/documents/city-budget-and-finances/accounting/comprehensive-annual-financial-report/fiscal-year-2022-annual-report. Accessed March 20, 2024.
[23] City of Long Beach. Police Department Overview. Page 4-7. Available at https://www.longbeach.gov/globalassets/finance/media-library/documents/city-budget-and-finances/budget/budget-documents/fy-21-adopted-budget/29-police. Accessed May 7, 2024.
[24] City of Long Beach Police Department. 2022 Year in Review. April 2023. Available at https://www.longbeach.gov/globalassets/police/media-library/documents/about-the-lbpd/year-in-review/2022-lbpd-year-in-review. Accessed May 3, 2024.

Lakewood, and Avalon on Catalina Island. The LBUSD operates 84 schools and serves 65,500 students.[25] Furthermore, under the provision of SB 50, school districts are authorized to collect fees to offset the costs associated with increasing school capacity as a result of development and related population increases; therefore, impacts associated with schools would be less than significant.

PUB-4 Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?

Less Than Significant Impact. The City operates 169 parks, 26 community centers, 2 tennis centers, 5 municipal golf courses, a public marina, and 6 miles of public beach. The closest park to the Project Site is the Los Altos Plaza Playground, located approximately 0.8 mile east of the Project Site. The Recreation Park Golf Course 18 is located 85 feet south of the Project Site. The Project would adaptively reuse an existing seven-story office building and provide housing for students. The Project would incorporate 22,523 sf of open space, that would include a student plaza, benches, lounging areas, pool, patio, outdoor BBQs and picnic tables, lawn area, shade structure, planters, and landscaping. Students residing on the Project Site would likely primarily utilize the amenities on-site. Additionally, the Project would be required to comply with LBMC Section 18.18.180, Park Fee as Additional and Supplemental Requirements, which requires that all residential and nonresidential development projects pay a proportionate share of the cost of providing park land and recreational improvements necessary to meet the needs created by such development. Therefore, impacts related to new of physically altered governmental facilities would be less than significant.

PUB-5 Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

Less Than Significant Impact. Other public facilities typically pertain to services such as public libraries. The City of Long Beach Public Library operates twelve libraries throughout the City.[26] The closest library to the Project Site is the Brewitt Neighborhood Library, located approximately 0.6-mile to the west of the Project Site. The introduction of new student residents could result in impacts to the provision of new of physically altered libraries. However, student residents would also have access to resources available at their colleges. Impacts related to public libraries would result in less than significant impacts.

[25] City of Long Beach Unified School District (LBUSD). About. Available at https://www.lbschools.net/about/about-long-beach-unified-school-district. Accessed May 3, 2024.
[26] City of Long Beach. Long Beach Public Library Locations. Available at https://www.longbeach.gov/library/visit/locations/. Accessed May 3, 2024.

Recreation

REC-1 Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

REC-2 Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. The Project would adaptively reuse an existing seven-story building and provide 149 residential suites with 593 beds for students. Therefore, the Project would introduce new student residents to the City. As discussed in the Initial Study, included in **Appendix A**, Students residing on the Project Site would likely primarily utilize the recreational amenities available on the Project Site. Furthermore, LBMC Section 18.18.180, *Park Fee as Additional and Supplemental Requirements,* requires that all residential and nonresidential development projects pay a proportionate share of the cost of providing park land and recreational improvements necessary to meet the needs created by such development. Therefore, the Project would be required to pay the park impact fee. Therefore, impacts to recreational facilities would have a less than significant impact.

Transportation

***TRA*-2 Would the Project conflict or be consistent with CEQA Guidelines § 15064.2, subdivision (b)?**

Less Than Significant Impact. CEQA Guidelines Section 15064.3(b) provides regulations on determining the significance of transportation impacts. As analyzed in **Appendix H: Trip Generation Analysis and Vehicle Miles Traveled Screening**, the City of Long Beach's Transportation Thresholds of Significance Guide (May 2020) provides screening criteria to identify when a project should be expected to cause a less than significant impact without conducting a Vehicle Miles Traveled (VMT) analysis. Based on the City's guidelines, the assumption of a less than significant impact can be made for the following types of projects: projects within a transit priority area (within 0.5 miles of a transit station and 15 minutes or less service frequency during peak hours), residential or office developments located in areas with low VMT with similar characteristics to the surrounding developments. As the Project falls within a Transit Priority Area (TPA) and a low VMT/capita area, VMT impacts would be less than significant.

Compared to the existing use, the Project is anticipated to generate 507 daily trips, 112 fewer trips during the weekday AM peak hour, and 3 trips during the weekday PM peak hour. The City of Long Beach Traffic Impact Analysis Guidelines (June 2020) states that a traffic impact study is generally required "for any project in Long Beach that is expected to generate 500 or more net new daily trips." Based on the City's traffic study guidelines, a traffic study would be needed if the project generates more than 500 net daily trips. However, it should be noted that the Project generates less than 50 total net new peak hour trips (the City's threshold to analyze LOS at intersections). Therefore, impacts would be less than significant.

TRA-3 Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. There is an existing driveway located on Clark Avenue that provides a two-way driveway for ingress and egress into the Project Site. The existing driveway would be maintained and would continue to provide access to the three levels of subterranean parking. As required by the LBMC, internal drive aisles would accommodate standard fire lane turning radiuses and hammerhead turnaround maneuvers design for emergency vehicles and fire services. The Project driveway and internal drive aisle configuration would be constructed pursuant to LBFD standards, and the Project would not require any off-site roadway improvements.

Because of the nature of the land use, the Project does not include the use of any incompatible vehicles or equipment on the Project Site. The Project would not increase hazards to the public due to incompatible use; the student residential uses by the Project are compatible with surrounding land uses. All on-site improvements would also be constructed as approved by the City of Long Beach Public Works Department. Sight distance at the Project driveway would be subject to compliance with applicable American Association of State Highway and Transportation Officials (AASHTO) Section 9.5.2: Sight Triangles sight distance standards. Therefore, no impacts would occur.

TRA-4 Would the Project result in inadequate emergency access?

Less Than Significant Impact. Emergency access is determined by the number of private and public access points, the width of the access point, and internal roadways serving a project site. As discussed above, primary vehicular access to the Project Site would be provided via a two-way driveway from Clark Avenue at the Project Site's western boundary. Pedestrian access to the Project Site is provided via sidewalks located along Pacific Coast Highway, East Anaheim Street, and Clark Avenue. Project Site design, including automobile and pedestrian access would comply with the City's design standards and other requirements as established in the LBMC. The Project plans are subject to site and design review and the LBFD would review the site plan prior to the approval of permits for construction of the Project to ensure that adequate emergency access is provided. Accordingly, the Project would not result in inadequate emergency access and any impacts would be less than significant.

Wildfire

WF-1 Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

WF-2 Would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

WF-3 Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

WF-4 Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is not located within a VHFHSZ in either the SRA or an LRA. The nearest VHFHSZ in the SRA is located approximately 16 miles northeast of the Project Site in Brea. The nearest VHFHSZ in the LRA map is located approximately 10 miles west of the Project Site in Rolling Hills Estates. The Project is located in a well-developed highly urbanized area not susceptible to wildfires and would not impair an adopted wildfire emergency response plan or emergency evacuation plan. Project design and site access would be required to adhere to the requirements of the LBFD's regulations and the City's Building Code, including the City's Fire Code. Infrastructure associated with Project would not exacerbate wildfire risk and the Project would not be located in an area with potential to expose occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, nor would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Accordingly, the Project would not result in wildfire impacts.

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8. References

1. 2022 California Green Building Standards Code. Chapter 4 Residential Mandatory Measures. Available at https://codes.iccsafe.org/content/CAGBC2022P1/chapter-4-residential-mandatory-measures . Accessed April 1, 2024.
2. California Department of Conservation. (2016). *California Important Farmland Finder.* Available at https://maps.conservation.ca.gov/dlrp/ciff/. Accessed March 18, 2024.
3. California Department of Conservation Division of Mine Reclamation. Mines Online. Available at https://maps.conservation.ca.gov/mol/index.html. Accessed March 18, 2024
4. California Department of Conservation. Tsunami Hazard Area Map. Available at https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13228059.8424%2C3969141.1141%2C-13085504.7847%2C4040151.1134%2C102100&utm_source=cgs%2Bpassive&utm_content=statewide. Accessed March 21, 2024.
5. California Department of Conservation. (2016). *Williamson Act/Land Conservation Act.* Available at http://www.conservation.ca.gov/dlrp/lca. Accessed March 18, 2024
6. California Department of Toxic Substances Control. DTSC's Hazardous Waste and Substances Site List- Site Cleanup (Cortese List). Available at https://dtsc.ca.gov/dtscs-cortese-list/. Accessed May 3, 2024
7. California Department of Transportation (Caltrans). *California State Scenic Highway System Map.* Available at https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed March 19, 2024.
8. California Department of Transportation, Transportation and Construction Vibration Guidance Manual, 2020 and Federal Transit Administration, Transit Noise and Vibration Assessment Manual, 2018.
9. California Department of Water Resources (CDWR), Guidebook for Implementation of Senate Bill 1610 and Senate Bill 221 of 2001 to assist water suppliers, cities, and counties in integrating water and land use planning; October 2003, https://digitalcommons.law.ggu.edu/cgi/viewcontent.cgi?article=1094&context=caldocs_agencies. Accessed June 11, 2024.
10. California Department of Water Resources. Dam Breach Inundation Map Web Publisher. Available at https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2. Accessed March 21, 2024.
11. California Geological Survey. California State Geoportal Seismic Hazards Program: Liquefaction Zones. Available at https://gis.data.ca.gov/datasets/b70a766a60ad4c0688babdd47497dbad_0/explore?location=33.784407%2C-118.135003%2C17.59. Accessed March 27, 2024.
12. CalRecycle, Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates, Accessed June 10, 2024

13. City of Long Beach, Addendum No. 2 to the Environmental Impact Report for the General Plan Land Use and Urban Design Elements Project, 2021, pages 3-95 to 3-96, https://files.ceqanet.opr.ca.gov/162983-9/attachment/mdMtUWk6XTyX9V8Y1gBH9m7E22p-9S1IMf_LyuphCyk-AgsQU5mkBL2lcGyoF_nbAVD7t3DS-KOm5R9p0. Accessed June 10, 2024.

14. City of Long Beach, Energy Resources https://www.longbeach.gov/energyresources/ (Accessed July 30, 2024).

15. City of Long beach General Plan, https://www.longbeach.gov/lbcd/planning/advance/general-plan/

16. City of Long Beach. (1973). *Conservation Element.* Available at https://www.longbeach.gov/globalassets/lbcd/media-library/documents/planning/advance/general-plan/1973-conservation-element. Accessed March 21, 2024.

17. City of Long Beach. Fire Department Calls for Service. February 2022. Available at https://www.longbeach.gov/globalassets/fire/media-library/documents/news/calls-for-service-february2022-combined. Accessed March 20, 2024.

18. City of Long Beach. Fiscal Year 2022 Annual Report. March 2023. Available at https://www.longbeach.gov/globalassets/finance/media-library/documents/city-budget-and-finances/accounting/comprehensive-annual-financial-report/fiscal-year-2022-annual-report. Accessed March 20, 2024

19. City of Long Beach, General Plan Land Use Element, December 2019, pages 65 to 67, https://www.longbeach.gov/globalassets/lbcd/media-library/documents/planning/advance/lueude/land-use-element-final-adopted-december-2019. Accessed August 1, 2024.

20. City of Long Beach, Interactive Bike Map, https://www.longbeach.gov/goactivelb/resources/interactive-bike-map/. Accessed August 20, 2024.

21. City of Long Beach. City of Long Beach Map. https://gis.longbeach.gov/mapit/. Accessed March 21, 2024.

22. City of Long Beach, 2023, "Natural Hazard Mitigation Plan Figure 4-2 and 4-3: Critical Facilities" https://www.longbeach.gov/globalassets/disaster-preparedness/media-library/documents/emergency-preparedness-plans/long-beach-natural-hazard-mitigation-plan-2023.(Accessed June 6, 2024)

23. City of Long Beach (2019). General Plan Urban Design Element. p.15 Available at https://www.longbeach.gov/globalassets/lbcd/media-library/documents/planning/advance/lueude/urban-design-element-final-adopted-december-2019.

24. City of Long Beach, General Plan Mobility Element, October 2013, https://www.longbeach.gov/globalassets/lbcd/media-library/documents/orphans/mobility-element/320615_lbds_mobility_element_web. Accessed August 23, 2024.

25. City of Long Beach. Long Beach Public Library Locations. Available at https://www.longbeach.gov/library/visit/locations/. Accessed May 3, 2024.

26. City of Long Beach, Municipal Code Section 21.52.271, 2024, https://library.municode.com/ca/long_beach/codes/municipal_code?nodeId=TIT21ZO_CH21.52COUS_DIVIISPCOCOADUSPE_21.52.271SPGRREBOCACOHOHAYHOBOLOCOHOLI. Accessed August 1, 2024.

27. City of Long Beach, Municipal Code Section 22.10.020, 2024, https://library.municode.com/ca/long_beach/codes/municipal_code?nodeId=TIT22TRZOCO_CH22.10GEPR_22.10.020PUIN. Accessed August 1, 2024.

28. City of Long Beach, Municipal Code Section 22.15.010, 2024, https://library.municode.com/ca/long_beach/codes/municipal_code?nodeId=TIT22TRZOCO_CH22.15US_22.15.010GEPR. Accessed August 1, 2024.

29. City of Long Beach, Municipal Code Section 21.52.271, 2024, https://library.municode.com/ca/long_beach/codes/municipal_code?nodeId=TIT21ZO_CH21.52COUS_DIVIISPCOCOADUSPE_21.52.271SPGRREBOCACOHOHAYHOBOLOCOHOLI. Accessed August 1, 2024.

30. City of Long Beach. Police Department Overview. Page 4-7. Available at https://www.longbeach.gov/globalassets/finance/media-library/documents/city-budget-and-finances/budget/budget-documents/fy-21-adopted-budget/29-police. Accessed May 7, 2024

31. City of Long Beach Unified School District (LBUSD). About. Available at https://www.lbschools.net/about/about-long-beach-unified-school-district. Accessed May 3, 2024.

32. City of Long Beach Utilities Department, Capital Improvement Program Fiscal Year 2023, 2022, page 2, https://www.lbutilities.org/files/sharedassets/utilities/v/1/about-us/documents/23_cip-final.pdf. Accessed June 11, 2024.

33. City of Long Beach, City of Long Beach Truck Routes, https://www.longbeach.gov/globalassets/pw/media-library/documents/resources/general/maps-and-gis/truckroutemap_web. Accessed August 20, 2024.

34. City of Los Angeles, Assembly Bill 2097, https://planning.lacity.gov/project-review/assembly-bill-2097. Accessed August 23, 2024.

35. City of Long Beach, Update on Citywide Fiber Network Infrastructure Initiative, 2021, page 2, https://www.longbeach.gov/globalassets/city-manager/media-library/documents/memos-to-the-mayor-tabbed-file-list-folders/2021/martch-4--2021--update-on-citywide-fiber-network-infrastructure-initiative. Accessed August 22, 2024.

36. County of Los Angeles, Long Beach Airport: Airport Influence Area, 2003, https://case.planning.lacounty.gov/assets/upl/project/aluc_airport-long-beach.pdf. Accessed June 6, 2024.

37. *DOF, (2024). E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2024. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/.*

38. Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, June 26, 2015. (Accessed August 13,2024)

39. Energy Information Administration U.S. Energy Information Administration. California State Energy Profile. https://www.eia.gov/state/print.php?sid=CA#:~:text=In%202022%2C%20renewable%20resources%2C%20including,supplied%20almost%20all%20the%20rest. Accessed: August 2024.

40. Federal Communications Commission, FCC National Broadband Map, https://broadbandmap.fcc.gov/location-summary/mobile?version=dec2022&location_id=bff41fe6-d3de-40da-9208-37f88b341778&addr1=4791+E+MALTA+ST&addr2=LONG+BEACH%2C+CA+90815&zoom=17.21&vlon=-118.133514&vlat=33.783000&env=0&tech=tech4g. Accessed August 22, 2024.

41. Federal Highway Administration, Roadway Construction Noise Model, 2006. (Accessed August 13, 2024)

42. Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018. (Accessed August 13, 2024)

43. Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map, 2024, https://msc.fema.gov/portal/search?AddressQuery=5150%20pacific%20coast%20highway%2C%20long%20beach%2C%20california. Accessed June 6, 2024

44. Federal Emergency Management Agency. FEMA Flood Map Service Center. Available at https://msc.fema.gov/portal/home. Accessed March 21, 2024.

45. Google Earth, 2024

46. Hayne, M.J., et al. 2006. *Prediction of Crowd Noise, Acoustics.*

47. Intergovernmental Panel on Climate Change, Carbon and Other Biogeochemical Cycles. In: Climate Change 2013: The Physical Science Basis, Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, 2013. http://www.climatechange2013.org/ images/report/WG1AR5_ALL_FINAL.pdf. Accessed August 2024.

48. *LACSD, Table 1: Loadings for Each Class of Land Use, https://www.lacsd.org/home/showpublisheddocument/3644/637644575489800000. Accessed June 7, 2024.*

49. LBUD, 2020 Urban Water Management Plan, 2020, page 59,67 https://www.lbutilities.org/files/sharedassets/utilities/v/1/about-us/documents/lbwd_uwmp2020_final_errata_revised.pdf. Accessed June 11, 2024.

50. LBMC, Section 8.80.160, Exterior noise limits - Correction for character of sound

51. LBMC, Section 8.80.020, Definitions https://library.municode.com/ca/long_beach/codes/municipal_code?nodeId=TIT8HESA_CH8.80NO_8.80.020DE (Accessed August 13, 2024.)

52. Long Beach Climate Action Plan, Adopted in August 2022. <https://www.longbeach.gov/globalassets/lbcd/media-library/documents/planning/lb-cap/adopted-lb-cap_-aug-2022>. (Accessed August 1, 2024)

53. Long Beach Press Telegram, January 9, 1955, “Richfield Refinery Here Termed Most Modern Plant in the West.”

54. Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, 2021, page 35, https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=16231&hp=yes&type=PDF. Accessed August 1, 2024.

55. Los Angeles County Public Works Department, Disaster Routes, 2023, https://pw.lacounty.gov/dsg/disasterroutes/. (Accessed June 6, 2024.)

56. Los Angeles County Public Works Department, Cities of Long Beach and Signal Hill, 2008, https://pw.lacounty.gov/dsg/DisasterRoutes/map/Long%20Beach.pdf. Accessed June 6, 2024.

57. Los Angeles County Sanitation Districts, A.K. Warren Water Resource Facility, https://www.lacsd.org/services/wastewater-sewage/facilities/ak-warren-water-resource-facility. Accessed June 11, 2024.

58. Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) (91 Cal. App. 4th 342, 378)).

59. National Park Service (NPS), What is the National Register of Historic Places?, March 20, 2024, https://www.nps.gov/subjects/nationalregister/what-is-the-national-register.htm. Accessed June 5, 2024.

60. Native American Heritage Commission, May 31, 2023, “Native American Heritage Commission Letter and Native American Tribal Consultation List”

61. NPS, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, page 7, https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf. Accessed June 5, 2024.

62. NPS, Technical Brief # 20: Archeological Damage Assessment: Legal Basis and Methods, February 2007, https://www.nps.gov/subjects/archeology/upload/tchBrf20_508.pdf. Accessed August 1, 2024.

63. Source: SCAG (2020). Connect SoCal. Retrieved from https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176 Accessed August 2024.

64. SCAG, (2016). 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction. https://scag.ca.gov/sites/main/files/file-attachments/2016_2040rtpscs_finalgrowthforecastbyjurisdiction.pdf?1605576071

65. *SCAG, (2020). 2020-2045 RTP/SCS Demographics and Growth Forecast. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579.*

66. SCAG, Connect SoCal 2024 Program Environmental Impact Report Chapter 2 Project Description, page 2-11, https://scag.ca.gov/sites/main/files/file-attachments/23-3052-peir-2024-draft-2-project-description.pdf?1699406150. Accessed August 21, 2024.

67. SCAG, 2045-2050 RTP/SCS Demographics and Growth Forecast Technical Report, 2024, https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839.

68. SCAG, RHNA Allocation Plan, 2020, https://scag.ca.gov/sites/main/files/file-attachments/6th_cycle_final_rhna_allocation_plan_070121.pdf?1646938785. Accessed June 5, 2024.

69. SCAQMD, https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25, Accessed July 31, 2024

70. South Coast Air Quality Management District, Localized Significance Threshold Methodology, July 2008. (Accessed July 31, 2024)

71. *South Coast Air Quality Management District, South Coast AQMD Air Quality Significance Thresholds, March 2023*. (*Accessed July 31, 2024)*

72. South Coast Air Quality Management District, Air Quality Management Plan, 2022; California Air Resources Board, Ambient Air Quality Standards, May 6, 2016, and U.S. EPA, NAAQS Table, February 7, 2024.

73. Southern California Association of Governments (SCAG); Local Profile, City of Long Beach; 2019; https://scag.ca.gov/sites/main/files/file-attachments/longbeach_localprofile.pdf?1606011233. Accessed June 5, 2024.

74. Southern California Association of Governments (SCAG), 2016, "2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction," https://scag.ca.gov/sites/main/files/file-attachments/2016_2040rtpscs_finalgrowthforecastbyjurisdiction.pdf?1605576071 (accessed August 1, 2024).

75. Southern California Association of Governments, *SB 375 Regional Plan Climate Targets*, https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets. (Accessed August 1, 2024)

76. Southern California Edison (SCE). 2022 Power Content Label. https://www.sce.com/sites/default/files/custom-files/PDF_Files/SCE_2022_Power_Content_Label_B%26W.pdf. Accessed July 30, 2024.

77. Society of Vertebrate Paleontology, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010

78. State CEQA Guidelines, Section 15064.5(b)(1).

79. State CEQA Guidelines, 15064.5(b)(3).

80. State CEQA Statute and Guidelines, Section 15064.5(c)(4).

81. State CEQA Guidelines, 15382.

82. U.S. EPA, Overview of Greenhouse Gases, (https://www.epa.gov/ghgemissions/overview-greenhouse-gases), accessed 12-30-2020; U.S. EPA, Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016, 2018; Intergovernmental Panel on Climate Change, Climate Change 2007: The Physical Science Basis, 2007; National Research Council, Advancing the Science of Climate Change, 2010; U.S. EPA, Methane and Nitrous Oxide Emission from Natural Sources, April 2010.

83. U. S. Geological Survey, "Water Quality Information by Topic," https://www.usgs.gov/special-topics/water-science-school/science/water-quality-information-topic (accessed June 11, 2024).

84. U.S. DOI, NPS, 1997, "National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation", page 8, https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf, (accessed January 19, 2024).

85. U.S. DOT, FTA. *Transit Noise and Vibration Impact Assessment Manual*, FTA Report No. 0123. September 2018

86. United States Fish and Wildlife. *National Wetlands Inventory.* Available at https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed March 18, 2024.

87. United States Department of the Interior (DOI), National Park Service (NPS), "What is the National Register of Historic Places?", (accessed January 19, 2024). https://www.nps.gov/subjects/nationalregister/what-is-the-national-register.htm (accessed January 19, 2024).

88. United States Department of the Interior, National Park Service, 1990, "Native American Graves Protection and Repatriation Act."

89. United States Department of the Interior, National Park Service, 2007, "Technical Brief # 20: Archeological Damage Assessment: Legal Basis and Methods."

90. United States Department of the Interior, National Park Service, 2017, "The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings."

91. United States Environmental Protection Agency (USEPA), Initial List of Hazardous Air Pollutants with Modifications, https://www.epa.gov/haps/initial-list-hazardous-air-pollutants-modifications (Accessed July 31, 2024).

92. USEPA, ://efaidnbmnnnibpcajpcglclefindmkaj/https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/vinyl

93. USEPA, https://www.epa.gov/haps/health-and-environmental-effects-hazardous-air-pollutants (Accessed July 31, 2024).