CALIFORNIA COASTAL COMMISSION
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Approved:	8/7/01
Staff:	CP-LB
Staff Report:	9/5/01
Hearing Date:	October 8, 2001
Commission Action:	

Item M10b

RECORD PACKET COPY

STAFF REPORT: REVISED FINDINGS
DE NOVO COASTAL DEVELOPMENT PERMIT

LOCAL GOVERNMENT: City of Long Beach

LOCAL DECISION: Approval with Conditions

APPEAL NUMBER: A-5-LOB-01-111

APPLICANT: Genesis Real Estate Group (Gordon Ip)

AGENTS: George Medak & Mel Nutter

PROJECT LOCATION: 350 E. Ocean Boulevard, City of Long Beach, Los Angeles Co.

PROJECT DESCRIPTION: Construction of two 18-story, 278-unit residential condominium towers (total of 556 units) above a three-level parking garage with 888 private parking spaces and 120 public parking spaces. Includes use of Victory Park and vacation of portions of the Elm Avenue, Marine Way and Seaside Way public rights-of-way.

COMMISSIONERS ON PREVAILING SIDE: Dettloff, Estolano, Hart, Susskind, McCoy, Orr, Potter, Woolley & Wan.

SUMMARY OF STAFF RECOMMENDATION

Staff is recommending that the Commission, after public hearing, adopt the following revised findings in support of the Commission's August 7, 2001 approval with conditions of Coastal Development Permit A-5-LOB-01-111. The revised findings reflect the modification of special condition two which addresses the management of the proposed project's on-site parking supply. A vote by the majority of the Commissioners on the prevailing side is necessary to adopt the revised findings. See **Page Two** for motion to adopt the revised findings.

SUBSTANTIVE FILE DOCUMENTS:

1. City of Long Beach Certified Local Coastal Program, 7/22/80.
2. City of Long Beach Local Coastal Development Permit No. 0012-20.
3. City of Long Beach Resolution of Intention to Vacate portions of Elm Way, Marine Way and Seaside Way, 4/17/2001.
4. City of Long Beach Vesting Tentative Tract Map No. 53405.
5. Residential Parking Demand Study, by Kaku Associates Inc., June 2001.
6. Appeal/Coastal Development Permit No. A-5-LOB-99-135 (100 E. Ocean Blvd.).
7. Long Beach LCP Amendment No. 1-99, August 1999.

STAFF RECOMMENDATION:

The staff recommends that the Commission adopt the following resolution to **APPROVE** the coastal development permit application with special conditions. Staff recommends a **YES** vote on the following motion:

MOTION

"I move that the Commission adopt the following revised findings in support of the Commission's approval of Coastal Development Permit A5-LOB-01-111 with conditions."

A **YES** vote by a majority of the Commissioners present who voted on the prevailing side would result in the adoption of the following resolution and revised findings (See list of Commissioners on Page One).

I. Resolution: Approval with Conditions

The Commission hereby **APPROVES** a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the City of Long Beach Local Coastal Program. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. Standard Conditions

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. Expiration. If development has not commenced, the permit will expire two years from the date this permit is reported to the Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.

4. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. Special Conditions

1. Permit Compliance

Coastal Development Permit A-5-LOB-01-111 permits 556 residential condominium units within two 18-story structures with a total of 1,008 on-site parking spaces located in a three-level parking garage located entirely below the grade of Ocean Boulevard. Any proposed change in the number of units, change in use, change in public accessways or view corridors, change in the on-site parking supply, or other deviation from the approved plans shall be submitted for review by the Executive Director to determine whether an amendment to this coastal development permit is necessary pursuant to the requirements of the Coastal Act and the California Code of Regulations. If the Executive Director determines that an amendment is necessary, no changes shall be made until the permit is amended by the Commission and issued by the Executive Director.

2. Parking Management

The applicant shall provide and maintain 1,008 on-site parking spaces in a three-level parking garage located entirely below the grade of Ocean Boulevard. These parking spaces shall be managed as follows:

A) As proposed by the applicant, a 120-space section of the parking garage shall be reserved and set aside for the exclusive use of the general public for the life of the project. None of these 120 parking spaces shall be sold or reserved for anyone other than the general public (except for handicapped spaces which are reserved for use by non-resident handicapped persons only). **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT,** the applicant shall submit a parking layout and management plan, subject to the review and approval of the Executive Director, which incorporates the following provisions:

1. A parking fee shall be charged for use of the public parking area. The fee charged for public parking shall be consistent with the hourly rates charged for parking in the downtown area, and the daily rates charged by the Long Beach Traffic and Parking Management Association (PTMO) for parking during special events. All fees collected for public parking shall be dedicated for the maintenance of the public parking supply and the public park.

2. The 120 public parking spaces shall be physically segregated from the other on-site parking spaces.

3. Signage shall be provided, consistent with the City's downtown parking program, to direct the public to the public parking area. The signage shall be visible from vehicles on Ocean Boulevard and Seaside Way, and shall clearly state "Public Parking."

4. Parking shall be prohibited in the 120 public parking spaces between the hours of 2 a.m. and 5 a.m. and shall be enforced by appropriate means specified in the parking management plan. Any proposed plan for overnight use of the public parking area shall be submitted to the Commission as an amendment to this coastal development permit along with provisions to ensure appropriate enforcement mechanisms that will protect the public parking during the hours designated for public parking.

B) The applicant shall provide and maintain the remaining 888 parking spaces for the exclusive use of the persons and guests of persons who live in the proposed development. Parking for handicapped residents shall be provided within the 888-space residence parking supply. Guests of residents shall not be charged for parking. The 888 spaces shall be managed as a common pool of shared parking, with no parking spaces sold or reserved except as provided below:

1. A maximum of one parking space per unit may be sold (or reserved) for the exclusive use of the person(s) who reside in each one-bedroom unit (297 units/297 parking spaces). The resident(s) of a one-bedroom unit may not have exclusive use of more than one parking space.

2. A maximum of two parking spaces per unit may be sold (or reserved) for the exclusive use of the person(s) who reside in each unit larger than one-bedroom, including one-bedroom units with studies (259 units/518 parking spaces). The resident(s) of units larger than one-bedroom, including one-bedroom units with studies, may not have exclusive use of more than two parking spaces.

3. The remainder of the 888 parking spaces (those not owned or reserved by residents) shall be managed as a common pool of shared parking for: residents who have opted not to purchase or otherwise reserve a parking space, residents in need of more than the maximum one or two parking

spaces allocated by items in Section 2.B.1 and 2.B.2 above, residents' guests, and employees of the proposed development. Guests of residents shall not be charged for parking.

C) The applicant shall keep a parking space inventory on the premises, available for public review, which accounts for each parking space in the garage. This list shall specify which parking spaces have been sold or reserved and to which unit they belong in the proposed project. In no case shall the residents of a single unit reserve more than the maximum one or two parking spaces allocated by items in Section 2.B.1 and 2.B.2 above.

D) **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT,** the applicant shall execute and record a deed restriction in a form and content acceptable to the Executive Director, incorporating all of the above terms of this condition. The deed restriction shall include a legal description of the applicant's entire parcel. The deed restriction shall run with the land, binding all successors and assigns, and shall be recorded free of prior liens that the Executive Director determines may affect the enforceability of the restriction. The deed restriction shall not be removed or changed without a Commission approved amendment to this coastal development permit.

3. Victory Park

A) The proposed condominium towers and all proposed private improvements, except for underground parking located entirely below the elevation of Ocean Boulevard, shall be set back a minimum of eighty feet (80') from the current southern curbline of Ocean Boulevard. Encroachments onto or over any portion of Victory Park are prohibited unless specifically permitted by a coastal development permit. Prohibited encroachments include, but are not limited to: gates, fences, walls, signs, tables, chairs, displays, merchandise racks, and roof overhangs. Public benches are permitted and encouraged.

B) The proposed Victory Park improvements shall be constructed concurrent with, the construction of the proposed condominium units. The proposed Victory Park improvements shall be completed, verified by the City as being in compliance with the Victory Park guidelines, and open for use by the general public, prior to occupancy of the proposed residential units. Subsequent to the completion of the proposed improvements to Victory Park, the permittee, its agents, managers, and sublessees shall not block or interfere with public access to and use of Victory Park at any time.

4. Public Access and Views

A) The applicant shall provide and maintain the following Ocean Boulevard level public accessways on the project site, for the life of the project::

1. A twenty-foot (20') wide north-south public walkway along the Hart Place right-of-way, connecting the Ocean Boulevard sidewalk to the Ocean

Boulevard level public promenade proposed to run the length of the southern edge of the project (as shown on Exhibit #5 of the 7/24/01 staff report). This twenty-foot wide north-south public walkway is a view corridor. No structures over 42 inches in height or parking areas shall be placed in the view corridor. Landscaping shall be maintained so as not to exceed 42 inches in height within the view corridor.

2. A forty-foot (40') wide north-south public walkway along the Elm Way right-of-way, connecting the Ocean Boulevard sidewalk to the Ocean Boulevard level public promenade proposed to run the length of the southern edge of the project (as shown on Exhibit #5 of the 7/24/01 staff report). This forty-foot wide north-south public walkway is a view corridor. No structures over 42 inches in height or parking areas shall be placed in the view corridor. Landscaping shall be maintained so as not to exceed 42 inches in height within the view corridor.

3. A twenty-foot (20') wide east-west Ocean Boulevard level public promenade running the length of the southern edge of the project from the Hart Place walkway to the public stairway which descends to the Linden Avenue sidewalk (as shown on Exhibit #5 of the 7/24/01 staff report).

B) The permittee, its agents, managers, and sublessees shall not block or interfere with public access to and along the public accessways described in this condition. Encroachments onto or over these public accessways and view corridors are prohibited unless specifically permitted by a coastal development permit. Prohibited encroachments include, but are not limited to: works of art, gates, fences, walls, above-grade signs, tables, chairs and displays. Public benches are permitted. Plaques, at least two square feet in area, shall be placed within the paving (on ground level) of each public accessway at: each end of the east-west public promenade and on each north-south accessway where they abut the Ocean Boulevard sidewalk. The plaques shall state "Public Accessway" with clearly visible text using letters at least two inches high. The public accessways shall be completed, and open for use by the general public, prior to occupancy of the proposed residential units. The applicant shall maintain the approved development consistent with the requirements of this condition.

C) **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT,** the applicant shall execute and record a deed restriction in a form and content acceptable to the Executive Director, incorporating all of the above terms of this condition. The deed restriction shall include a legal description of the applicant's entire parcel and an exhibit showing the public accessways and view corridors (Exhibit #5 of the 7/24/01 staff report). The deed restriction shall run with the land, binding all successors and assigns, and shall be recorded free of prior liens that the Executive Director determines may affect the enforceability of the restriction. The deed restriction shall not be removed or changed without a Commission approved amendment to this coastal development permit.

D) Special Provisions for Grand Prix Race Weekend. On the Friday, Saturday and Sunday of the annual Long Beach Grand Prix event, when admission fees are permitted to be charged to the event spectators, the public accessways and view corridors described in this condition may be temporarily closed and/or controlled for public safety and security purposes. All other provisions of this condition apply at all other times.

5. Pedestrian Bridge

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall provide the either of the following (A or B) for the review and approval of the Executive Director:

A) Written evidence that the applicant has submitted its payment of an in lieu fee to the City account dedicated for the construction of public pedestrian bridges over Hart Place and Linden Avenue. The amount of the in lieu fee shall be equivalent to one-half of the cost of the two public pedestrian bridges across Hart Place and Linden Avenue to join the promenade to the adjoining properties (Harbor Place and Convention Center), consistent with the requirements of City of Long Beach Case No. 0012-20 (Site Plan Review, Standards Variance and Vesting Tentative Tract Map), **OR**,

B) A written agreement that the applicant will construct, as part of the proposed development, the entire public pedestrian bridge across Hart Place to join the promenade to the adjoining property to the west (Convention Center). If the applicant chooses this option (option B), the agreement shall specify that the public pedestrian bridge shall be completed, and open for use by the general public, prior to occupancy of the proposed residential units.

The permittee, its agents, managers, and sublessees shall not block or interfere with public access to or across the public pedestrian bridge(s).

6. Traffic and Parking Management Association

The applicant and all designated operators and managers of the parking facilities proposed herein shall participate in the Traffic and Parking Management Association established pursuant to the City of Long Beach certified Local Coastal Program [see certified LCP Downtown Shoreline Planned Development Plan (PD-6): General Development and Use Standard (b)6].

7. Local Government Approval

This action has no effect on conditions imposed by a local government pursuant to an authority other than the Coastal Act, including the conditions of City of Long Beach Case No. 0012-20 (Site Plan Review, Standards Variance and Vesting Tentative Tract Map).

IV. Findings and Declarations

The Commission hereby finds and declares:

A. Project Description and History

The applicant proposes to construct two 18-story, 278-unit residential condominium towers (total of 556 units) above a three-level parking garage (Exhibit #6). Each proposed condominium tower would reach approximately 220 feet above Ocean Boulevard level and 250 feet above Seaside Way elevation (Exhibit #6). The proposed 1,008-space parking garage does not exceed the elevation of Ocean Boulevard. No commercial uses are proposed as part of the proposed residential condominium project.

The project site is located on the coastal bluff which runs along the south (seaward) side of Ocean Boulevard in downtown Long Beach (Exhibit #2). In the 1950's, the ocean and beach occupied the area near the toe of this bluff, but several landfill projects (most occurring prior to the Coastal Act) and the construction of the Long Beach Convention and Entertainment Center have displaced the former beach. The nearest shoreline is the beach located about a thousand feet southeast of the site (Exhibit #2). The Chapter 138 Line, which runs along Seaside Way on the southern boundary of the site, is the former shoreline and the boundary between the Commission's area of original jurisdiction (tidelands) and the City's LCP jurisdiction (Exhibit #3).

Except for Victory Park and Elm Avenue which are improved, the project site is vacant and has been fenced-off for several years. The area located to the west and south of the project site is occupied by the Long Beach Convention and Entertainment Center and its parking facilities (Exhibit #2). The blocks to the north and east of the project site are developed with high-rise residential and commercial buildings.

The 2.226-acre project site includes portions of the Elm Avenue, Marine Way and Seaside Way public rights-of-way which the City intends to vacate (Exhibit #3). The use of Victory Park, a park strip on the coastal bluff approximately eighty feet wide, is also included as part of the proposed project (Exhibit #4).

Victory Park would be excavated and developed for the proposed project's three-level parking garage, which includes 120 parking spaces dedicated for public use only. The three-level garage would be built entirely below Ocean Boulevard grade (Exhibit #6, p.2). After the park is demolished and excavated, and the proposed parking garage is constructed, the applicant proposes to landscape the top of the garage roof and restore the area as a City park (Exhibit #4). The restored park would be the same elevation as Ocean Boulevard. The proposed towers are set back eighty feet from the Ocean Boulevard curbline. The restored park would be bisected by a driveway providing vehicular access to the proposed parking garage. The proposed driveway through the park would occupy the present Elm Avenue right-of-way.

The proposed three-level parking garage contains 888 parking spaces for the proposed 556 residential units (including guest parking) and 120 parking spaces dedicated for public use only. The 120 of the parking spaces are dedicated for public use because the proposed

parking garage is partially located on the public property beneath Victory Park. Vehicular access to the parking garage is proposed from Ocean Boulevard (via Elm Avenue), Hart Place and Linden Avenue (Exhibit #4). Vehicular access from Seaside Way is not proposed in order to avoid conflict with the use of Seaside Way for the annual Long Beach Grand Prix circuit each April.

The City approval of the tract map includes required easements for public pedestrian access on the Ocean Boulevard level across the following three portions of the project site:

> East/west public promenade (20' wide) along the entire southern (seaward) side of site.
> North-South walkway (20' wide) on Hart Place along the entire western side of the site.
> North-South walkway between the two towers (applicant proposes 40' wide) from Victory Park to east/west promenade. [See Exhibit #5].

The two north/south easements for public access are also view corridors which preserve views through the site from Ocean Boulevard (Exhibit #6). The proposed project includes a circular drop-off and loading area situated between the two towers and within the Elm Avenue view corridor (Exhibit #4). The applicant has deleted all surface parking areas from the forty-foot wide Elm Avenue view corridor. The two towers would be cantilevered over half of the City-required twenty-foot wide public promenade situated along the entire southern side of the site at Ocean Boulevard elevation.

The Commission's standard of review for the proposed development is the certified Long Beach LCP. The certified Long Beach LCP is comprised of the certified Land Use Plan (LUP) and the certified implementing ordinances (LIP). The certified LUP is comprised of the land use map of the City's General Plan and the planning policies of the certified LCP. The certified implementing ordinances (LIP) carry out the policies of the certified LUP. The certified implementing ordinances (LIP) that apply to the proposed development are the development standards for Planned Development District No. 6 (PD-6). Planned Development District No. 6 covers the Downtown Shoreline area of Long Beach (Exhibit #2). The proposed project is located in Subarea 9 of PD-6.

B. Land Use

The proposed project, two high-density residential condominium towers (total of 556 units), is an allowable use pursuant to the certified Long Beach LCP. Public parking is allowable use in Victory Park. The project site occupies the properties immediately west and east of Elm Avenue (Exhibit #3). In regards to allowable uses in Subarea 9 of PD-6, the certified LCP states:

> *Uses: Dense residential or hotel, west of Elm Avenue; dense residential or mixed residential and office in the same structure east of Elm Avenue. Retail and restaurant uses shall be permitted at the Ocean Boulevard level, or at top levels. Victory Park in the subarea shall be a dedicated City park. Residential uses shall not exceed a density of two hundred and fifty (250) dwelling units per acre.*

The certified LCP states that residential density on the site shall not exceed 250 dwelling units per acre. The applicant has submitted a survey showing that the project site contains 2.226 acres, including the portions of the Elm Avenue, Marine Way and Seaside Way rights-of-way that are being vacated as part of the proposed project. The residential density limit in the certified LCP allows a maximum of 556 dwelling units on the 2.226-acre site (250 x 2.226 acres = 556.5 units). The proposed project includes the maximum allowable 556 residential units for the 2.226-acre site. Therefore, the proposed land use conforms to the certified Long Beach LCP.

C. Parking

The downtown neighborhood where the project is proposed currently suffers from an insufficient parking supply. During the local hearings on the proposed project, the appellants and other local residents testified that the area suffers from a shortage of adequate parking. The shortage of parking in the project area is the result of the presence of several older high-density residential developments that lack adequate on-site parking, the high parking demand generated by events at the Long Beach Convention and Entertainment Center, and the parking demand generated by local commercial uses.

The nearby shoreline recreation facilities (beach and marina), located about a half-mile south and west of the proposed project, generate little parking demand in the immediate area of the proposed project because these shoreline recreational facilities have their own protected parking supplies which, for the most part, are adequate to meet the parking demands of the public recreationists.

Generally, it is the local residents that are competing with one another for the small amount of parking that is available in the area, except during special events that generate very high demands for parking. Annual special events, including the Long Beach Grand Prix, Gay Pride Festival, Beachfest, and numerous concerts and sporting events create very high demands for parking throughout the Downtown Shoreline area. Peak parking demand periods usually occur when special events are being held simultaneously within and adjacent to the Long Beach Convention and Entertainment Center.

The increased demand for parking during these events, as mandated by the certified LCP, is managed by the Parking and Traffic Management Organization (PTMO). The PTMO is an association that manages the sharing of private parking facilities throughout the Downtown Shoreline area in order to ensure that an adequate downtown parking supply is available during peak parking demand periods. The proposed project includes the provision of 120 public parking spaces in the proposed parking garage, which is partially located on public property. The City tract map and site plan review approval requires the applicant to participate in the PTMO and to make the 120 public parking spaces available as part of the shared parking plan that is organized and implemented through the PTMO. A condition of this permit also mandates the applicant's participation in the PTMO.

LCP Parking Requirements

Stated succinctly, the transportation and access policies contained in the Land Use Plan (LUP) portion of the certified Long Beach LCP state:

1. *Increase reliance on public transit.*
2. *Decrease reliance on automobiles.*
3. *Provide slightly more parking*
4. *Increase pedestrian and bicycle access opportunities.*

The Implementing Ordinances (LIP) portion of the certified LCP, in this case the development standards for Planned Development District No. 6, requires that all new development provide parking at a specific standard (two parking spaces per unit plus guest parking) in order to ensure that the parking supply is sufficient to meet the parking demands of the project, and also to avoid any increase in competition for the limited shared parking facilities in the coastal zone (i.e., public parking lots and on-street parking spaces). The certified LIP, however, also allows the City to grant variances from the standards of the Planned Development Ordinance stating:

> *"In reviewing and approving site plans and tract maps for the development of the area, the City Planning Commission shall be guided by the goals and policies of the General Plan and General Development and Use Standards specified herein. The Commission shall not permit variance from those standards unless it finds that such variance meets the intent of the standards of this plan."*

In fact, the proposed project includes a City-approved Standards Variance that would allow the applicant to provide substantially fewer on-site parking spaces than would be required by the parking standard contained in the certified LCP. The certified LCP requires that on-site parking be provided (below Ocean Boulevard level) at the following rate:

> PD-6 General Development and Use Standards: Parking (d)
>
> *Two spaces per residential unit (2 spaces/unit)*
> *plus guest parking: one space per six residential units (1 space/6 units)*
>
> PD-6 Subarea 9 Specific Development and Use Standards: Parking (d)
>
> *Parking for all construction of new buildings shall be in parking structures not to exceed Ocean Boulevard elevation. Parking structures not visible from Ocean Boulevard may exceed the Ocean Boulevard elevation. Parking spaces shall be provided as designated in the general development and use standards for new uses.*

The above-stated certified LCP parking standard would require the proposed 556-unit project provide 1,205 on-site parking spaces (2 parking spaces x 556 units = 1,112 parking spaces, plus 93 guest parking spaces).

The proposed residential project, for which the City granted a parking variance, includes 888 on-site parking spaces located in a three-level parking garage located entirely below the grade of Ocean Boulevard (the additional 120 public parking spaces are being built for public use, and are not part of the parking supply for the proposed 556 residential units). Therefore, the applicant is requesting an exception to the LCP parking requirement by proposing to provide 317 parking spaces fewer than the 1,205 spaces required by the standard contained in the certified LCP.

Applicant's Proposed Parking Plan

In support of the requested exception to the LCP parking requirement, the applicant has submitted a parking study conducted by Kaku Associates (Exhibit #15). The applicant's parking study, which supports the assertion that the proposed on-site parking supply will meet the demands of the proposed project, is based on parking occupancy counts at eleven high-density apartment and condominium complexes located in the coastal zone in downtown Long Beach, San Diego, Marina del Rey and Santa Monica. The parking occupancy counts were conducted at midnight on a weekday, when residential parking demands are highest.

The applicant's parking study shows that the majority of condominium units tend to be occupied by people who own no more than one car, especially persons who live in high-density residential developments in the coastal zone cities of Long Beach, San Diego, Marina del Rey and Santa Monica. The parking study shows that the proposed on-site parking supply for the proposed project would be adequate to meet the needs of the eleven study sites which were found to have peak parking demands of 0.66 to 1.59 parking spaces per occupied residential unit (See Graph, Exhibit #15, p.3). The 888 parking spaces proposed to serve the 556 residential units equals a ratio of 1.59 parking spaces per residential unit (888 spaces/556 units = 1.59). The parking ratio of the certified LCP parking standard is 2.17 parking spaces per residential unit (1,205 spaces/556 units = 2.17).

The parking demand ratios presented in the applicant's parking study (parking space counts within existing residential uses) reflect the number of parking spaces occupied per occupied residential unit. The parking study's ratios do not take into account the unoccupied parking spaces that are reserved for the exclusive use of a single residential unit and no one else. That is, the parking demand ratio can correctly reflect the demand for parking only when the entire parking supply is shared on a first-come, first-served basis. Only on a shared use basis can the unoccupied parking spaces be correctly counted as empty and unused. For example, a resident or guest looking for an available parking space in an empty garage may not find one because all of the empty spaces could have been reserved for use by only one specific resident. The empty parking spaces, in this case, would not be available to meet the actual demand for parking since they are reserved for the exclusive use of one person.

For example, the proposed project includes 888 parking spaces for residents and guests of the proposed project. If the applicant sells all 556 proposed condominium units, and each condominium unit sale includes two reserved parking spaces, there is a parking demand for 1,112 parking spaces (2 spaces per unit x 556 units = 1,112 parking spaces) before any actually parks a vehicle in the garage. On the other hand, if the proposed 888-space parking supply for residents and guests is a shared reservoir where all parking spaces are available on

a first-come, first-served basis, then the proposed parking supply will meet a parking demand of up to 1.59 parking spaces per unit. A parking demand of 1.59 parking spaces per unit is as high as the highest parking demand ratio presented in the applicant's parking study for existing high-density residential uses in the coastal zone: 0.66 to 1.59 parking spaces per occupied residential unit (See Graph, Exhibit #15, p.3).

In any case, the staff has accepted the results of the parking study as being accurate, and has concluded that the parking demand calculations presented in the report are consistent with similar studies that have been submitted for Commission review for residential projects in Long Beach and Marina del Rey. Provisions are necessary, however, to limit the number of spaces that may be reserved for each residential unit in order to ensure that adequate on-site parking is available for all of the residents and guests of the proposed project (see Special Condition Two: Parking Management).

The applicant is proposing that the 888-space on-site parking supply be comprised of both shared and reserved parking areas because some of the proposed 556 condominium units will be sold with one reserved parking space, some will be sold with two reserved parking spaces, and some units will not be sold but rented as apartments with no reserved parking spaces. The applicant's proposed parking management plan would allocate the on-site parking supply as follows:

10 Three-bedroom units/2 spaces each	20 Parking Spaces (maximum)
189 Two-bedroom units/2 spaces each	378 Parking Spaces (maximum)
60 One-bedroom with study/2 spaces each	120 Parking Spaces (maximum)
297 One-bedroom only units/1 space each	297 Parking Spaces (maximum)
Unallocated spaces not reserved	73 Parking Spaces (minimum)
556 Total Units	**888 Parking Spaces Total**

(Plus 120 Public Parking Spaces in Victory Park)

The applicant states that all 888 parking spaces for the residents would be held in a hybrid shared/reserved parking reservoir, with one or two individual parking spaces sold (and thus reserved) with each sale of a condominium unit. The sales of parking spaces would be limited to a one parking space maximum for the one-bedroom units, and a two parking space maximum for units larger than one bedroom, including one-bedrooms with studies. Therefore, the common pool of residential parking would start with 888 parking spaces, with individual parking spaces being sold-off one or two at a time, until there would eventually be only a 73-space pool when and if all 556 condominium units are sold along with the maximum number of parking spaces. Of course, should some two- and three-bedroom condominium owners chose to buy (and reserve) only one parking space (instead of the maximum two parking spaces per unit), or should some units remain unsold, the common pool of parking will stabilize at a point somewhere greater than 73 parking spaces.

In any case, the proposed 120-space public parking supply would be the available for use by the public only, and would not be counted to meet the parking demands of the residents and guests of the proposed project. The City has required the applicant, as part of the street

vacation and tract map approvals, to provide the 120 parking spaces for public use in exchange for using the underground portion of Victory Park for part of the proposed project's parking garage. The applicant has agreed to provide the 120 public parking spaces as required by the City.

The applicant states that the proposed project will not reduce the number of public parking spaces on Ocean Boulevard. The City is considering whether to remove approximately fourteen curbside parking spaces from the south curb of Ocean Boulevard in order to open an additional eastbound traffic lane on Ocean Boulevard. The removal of the curbside parking spaces and creation of an additional eastbound traffic lane on Ocean Boulevard are being considered as mitigation for traffic impacts in downtown Long Beach, but not as part of the currently proposed project. Any alteration of the existing curbside parking supply would be reviewed under a separate local coastal development permit.

Parking Supply and Management Requirements

If the applicant's proposal to provide 888 on-site parking spaces for the proposed 556 condominium units will meet the goals and carry out the intent of the certified LUP, then the Commission may grant an exception to the parking standard contained in the certified LIP (Planned Development District No. 6). The goals of the certified LUP are to protect public access to the shoreline, ensure that the each project's parking supply is sufficient to meet its parking demands, and to:

1. *Increase reliance on public transit.*
2. *Decrease reliance on automobiles.*
3. *Provide slightly more parking*
4. *Increase pedestrian and bicycle access opportunities.*

Avoiding any increase in competition for the limited shared parking facilities in the coastal zone (i.e., public parking lots and on-street parking spaces) also protects public access to the shoreline by making it easier for shoreline visitors to find a parking space.

The Commission, in a recent amendment to the Subarea 7 standards of Planned Development District No. 6, specifically incorporated a provision which allows exceptions to the parking standards listed in the General Development and Use Standards for PD-6 [See LCP Amendment No. 1-99]. The LCP amendment affected only the LCP standards for Subarea 7 because it was a project driven (hotel) LCP amendment. The currently proposed project is in Subarea 9 of PD-6. For parking requirements in Subarea 7 of PD-6, located three blocks west of the proposed project, the certified LIP states (emphasis added):

> *Number of spaces. Reuse of existing buildings shall not require parking in excess of what currently exists. New construction shall provide parking as required for new development pursuant to the parking standards listed in the General Development and Use Standards for PD-6, or pursuant to a detailed parking study that demonstrates that the project will provide adequate parking to meet the needs of the development without causing negative impacts to coastal access or access to public recreational facilities...*

Although the above-stated parking standard is not applicable to the site of the currently proposed project, the Commission's acceptance of a "detailed parking study" in lieu of strict adherence to the general development parking standard of two parking spaces per unit (plus guest parking) indicates that a finding of consistency with the certified LCP can be made if "the project will provide adequate parking to meet the needs of the development without causing negative impacts to coastal access or access to public recreational facilities." The certified LIP specifically states that variances from the standards of the LIP shall not be granted unless "such variance meets the intent of the standards of this plan." Therefore, if the proposed project meets the intent of the certified LCP in regards to parking, then an exception may be granted to the general development parking standard of two parking spaces per unit (plus guest parking).

The proposed project will provide an adequate parking supply to meet the needs of the residents and guests without causing negative impacts to coastal access or access to public recreational facilities. The limited parking supply will decrease reliance on automobiles and increase reliance on public transit as required by the LUP access and transportation policies. The applicant's parking study shows that high-density residential developments in Southern California cities (Long Beach, San Diego, Marina del Rey and Santa Monica) generate a parking demand of 0.66 to 1.59 parking spaces per occupied residential unit (See Graph, Exhibit #15, p.3). The 888 parking spaces proposed to serve the 556 residential units equals a ratio of 1.59 parking spaces per residential unit (888 spaces/556 units = 1.59). Therefore, the proposed parking ratio of 1.59 parking spaces per residential unit meets the highest actual demand for parking in similar developments in the coastal zone and can be expected to provide an adequate supply to meet the needs of the proposed development.

In the event that the parking demand of the proposed project exceeds the proposed supply of 888 on-site parking spaces, it is unlikely that it would result in any negative impacts to coastal access or access to public recreational facilities. The on-street parking that exists near the proposed project is highly sought after by local residents and customers of the nearby commercial uses, but is not a primary parking supply for coastal access. The parking for the nearby shoreline recreation facilities (beach and marina), located about a half-mile south and west of the proposed project, would be very inconvenient for use by the residents of the proposed project or any of the other properties located inland of Shoreline Drive (Exhibit #2). Besides the half-mile distance between the project site and the recreational parking facilities, one would have to cross Shoreline Drive, a six-lane highway with limited crossings. In addition, the special conditions of Coastal Development Permit 5-00-050 (City of Long Beach), and City parking permit requirements for the marina parking, prohibit residents from storing their vehicles in the public parking lots located south of Shoreline Drive.

The applicant's parking study shows that the proposed 888 on-site parking spaces will be sufficient to serve the proposed project. Each unit will be served by 1.59 parking spaces, but no one can purchase 1.59 spaces. The parking spaces, however, will be sold as whole spaces (not fractions) as part of each condominium sale. There are not enough parking spaces (888 spaces) to allow two parking spaces to sold with each of the 556 proposed condominium units (2 x 556 = 1,112). Therefore, there must be a limit on how many parking spaces can be sold (and thus reserved) with each condominium unit.

The applicant, in meetings with Commission staff, agreed to the following formula:

> A maximum of one parking space per unit may be sold (or reserved) for the exclusive use of the person(s) who reside in each one-bedroom unit (297 units/297 parking spaces). The resident(s) of a one-bedroom unit may not have exclusive use of more than one parking space. One space per unit, regardless of number of residents in each unit.
>
> A maximum of two parking spaces per unit may be sold (or reserved) for the exclusive use of the person(s) who reside in each unit larger than one-bedroom, including one-bedroom units with studies (259 units/518 parking spaces). The resident(s) of units larger than one-bedroom, including one-bedroom units with studies, may not have exclusive use of more than two parking spaces. Two spaces per unit, regardless of number of residents in each unit.
>
> The remainder of the 888 parking spaces (those not owned or reserved by residents) shall be managed as a common pool of shared parking for: residents who have opted not to purchase or otherwise reserve a parking space, residents in need of more than the maximum one or two parking spaces as allocated above, and guests and employees of the proposed project.

The above-stated formula would result in the 888 proposed on-site parking spaces being used as follows:

10 Three-bedroom units/2 spaces each	20 Parking Spaces (maximum)
189 Two-bedroom units/2 spaces each	378 Parking Spaces (maximum)
60 One-bedroom with study/2 spaces each	120 Parking Spaces (maximum)
297 One-bedroom only units/1 space each	297 Parking Spaces (maximum)
Unallocated spaces not reserved	73 Parking Spaces (minimum)
556 Total Units	**888 Parking Spaces Total**

(Plus 120 Public Parking Spaces in Victory Park)

The Commission finds that the proposed 888-space parking supply, if managed to limit the sales of parking spaces as stated above, will meet the goals and intent of the certified LCP. Therefore, Special Condition Two of the permit requires the applicant to manage the proposed parking supply in order to limit the number of parking spaces sold and reserved in order to ensure that there will be adequate parking available to meet the needs of the residents and guests of the proposed project. In order to protect public access to the 120 public parking spaces being provided as part of the proposed project, Special Condition Two also requires the applicants to segregate and manage the 120 public parking spaces in a manner which will prevent resident and guest use of the public parking (e.g. charge fees for public parking and prohibit overnight vehicle storage). Only as conditioned does the proposed project meet the goals and intent of the certified LCP.

In addition, Special Condition Six requires the applicant and all designated operators and managers of the parking facilities proposed herein to participate in the Traffic and Parking

Management Association (PTMO) established pursuant to the City of Long Beach certified LCP. The PTMO is an association that manages the sharing of private parking facilities throughout the Downtown Shoreline area in order to ensure that an adequate downtown parking supply is available during peak parking demand periods. The City tract map and site plan review approval requires the applicant to participate in the PTMO and to make the 120 public parking spaces available as part of the shared parking plan that is organized and implemented through the PTMO. A condition of this permit also mandates the applicant's participation in the PTMO.

In regards to the PTMO, the certified LCP states:

> PD-6 General Development and Use Standards: Access (b)(6)
>
> *A Traffic and Parking Management Association shall be created to monitor traffic generation and parking demand in the Planned Development Area, and to implement specific parking management strategies and transportation demand management programs as needed. The goal of the traffic and parking management program shall be to provide adequate parking to support the development in a cost-effective manner, and to provide public access to the coast while providing some discouragement for use of private automobiles over transit alternatives. The goal of the transportation demand management shall be to minimize the negative impacts of project-related trips on local streets and intersections and upon the regional freeway network; it shall consider measures such as providing no free on-site parking for employees and providing employees with free transit passes. All development within the project area shall be required to participate in the Association when it is formed. The Association shall be formed prior to commencement of development of LCP Subarea 5 or of the retail/entertainment complex in Subarea 6 west of Pine Avenue."*

Only as conditioned to participate in the PTMO is the proposed project consistent with the requirements of the certified Long Beach LCP.

D. Public Access and Views

The City of Long Beach certified LCP contains policies to protect and enhance physical, visual, and psychological access to the coast. The LUP states that the principal element of the access component is the Promenade. The Promenade, a dedicated north/south running pedestrian walkway, connects the heart of the downtown area to the shoreline amenities of Long Beach situated south of Ocean Boulevard. The Promenade South (the portion south of Ocean Boulevard) provides direct pedestrian access to the Convention Center and Hotel, Rainbow Harbor, the Shoreline Village shopping area, and indirect access to Marina Green Park and the Downtown Marina.

In regards to pedestrian access, the certified LCP states:

PD-6 Subarea 7 Specific Development and Use Standards: Access

(b)2. Pedestrian Access. Pedestrian access will be provided from Ocean Boulevard southerly on the Promenade South as approved in Coastal Commission Permit No. A71-78. The east/west pedestrian walkway shall either be extended through this area along the southern edge of development parcels to the Promenade South or alternative public pedestrian access and viewing area(s) shall be provided at higher elevations. In order to provide necessary pedestrian interaction in the area, new developments shall provide public walkways, at least ten feet in width, around the perimeter of the site except where a site abuts to public street(s) with adequate public pedestrian walkways at least 15' feet in width. In addition, whenever it is feasible the development shall provide shoreline viewing areas. The walkways and viewing areas shall be guaranteed public access through easements or deed restrictions.

The Promenade, which runs north/south and ends at the shoreline, should not be confused with the east/west promenade. The east/west promenade is a public pedestrian accessway that runs parallel to Ocean Boulevard on the southern edge of the blufftop properties on the south side of Ocean Boulevard, including the properties subject to this appeal. The proposed development is located in Subarea 9 of PD-6, three blocks east of the north/south Promenade referred to above. Therefore, the proposed project will not interfere with public pedestrian access on the Promenade.

The other major pedestrian access element of the certified LCP is the plan for a continuous elevated east/west public walkway on the seaward side of the Ocean Boulevard high-rises. The east/west walkway, which is not currently contiguous, would parallel Seaside Way on the level of Ocean Boulevard. This east/west walkway is referred to in this report as both the east/west walkway and the promenade, with a small "p".

In Subarea 9, where the proposed project is located, the certified LCP requires the provision of a twenty-foot wide east/west walkway along the entire southern edge of the site:

PD-6 Subarea 9 Specific Development and Use Standards: Access

(b)2. Pedestrian Access. Pedestrian access shall be provided along the southern edge of the subarea by a public promenade twenty feet (20') in width from Hart Place to Lime Avenue. This promenade shall be at Ocean Boulevard level adjoining the north curb of Seaside way or on the southern edge of any development utilizing air rights over Seaside Way.

The proposed project includes the required twenty-foot wide east/west walkway along the southern edge of the site (Exhibit #5). This public walkway would provide public views to the shoreline area located south of the proposed project. The provision of the east/west public walkway is necessary to replace the views that currently exist across the site from Ocean Boulevard and Victory Park (and which will be partially blocked by the proposed project). The Commission's condition of approval requires the applicant to record a deed restriction that

guarantees public access (and signage) to the proposed east/west promenade on the Ocean Boulevard level. The public access requirements apply at all times except during the annual Grand Prix Race Weekend when crowds of over 100,000 come to the project area to watch (with paid admission) the automobile races. The Commission has reviewed and approved a coastal development permit for the annual Grand Prix event for the last 27 years. Therefore, on the Friday, Saturday and Sunday of the annual Long Beach Grand Prix event, when the Commission permits admission fees to be charged to the event spectators, the public accessways and view corridors described in the special conditions may be temporarily closed and/or controlled for public safety and security purposes. The provisions of Special Condition Four apply at all other times. Only as conditioned does the proposed development conform to the requirements of the certified Long Beach LCP.

The certified LCP also states that two thirty-foot wide north-south walkways shall be provided through the project site and that these walkways shall be open public areas providing unobstructed views to the southern boundary of the subarea. The two required north/south walkways shall provide pedestrian access to the required east/west promenade.

> PD-6 Subarea 9 Specific Development and Use Standards: Access
>
> *(b)2. A public walkway from Ocean Boulevard to the [p]romenade shall be provided at Hart Place, Elm Avenue, Atlantic Avenue and Lime Avenue. These walks shall be within open public areas not less than 30 feet (30') in width providing an unobstructed view from Ocean Boulevard to the southern boundary of the subarea.*

The above-stated LCP standard requires that two thirty-foot wide north-south walkways be provided on the project site: one at Hart Place on western edge of site and one at Elm Avenue in the middle of the project site between the two proposed towers (Exhibit #5). These public walkways are also protected view corridors, providing views south from Ocean Boulevard and Victory Park. The City approval permitted a reduced width (20' instead of 30') for the north-south walkway located at Hart Place on the western edge of site (Exhibit #5).

The view down the proposed twenty-foot wide Hart Place view corridor from Ocean Boulevard to the shoreline area is interrupted by the Long Beach Arena, the structure painted with a mural featuring various whales and fish. While the view from Hart Place is a valuable public view, the Elm Avenue view corridor features a view of the marina and shoreline from Ocean Boulevard and Victory Park. The applicant proposes to provide the total sixty feet of view corridor on the Hart Place and Elm Avenue view corridors as required by the LCP, but in lieu of the two thirty-foot wide (30'/30') view corridors, the applicant is proposing one forty-foot wide view corridor (Elm Avenue) and one twenty-foot wide view corridor (Hart Place) for a total width of sixty feet (40'/20')(Exhibit #5).

The Commission finds that the proposed forty-foot wide view corridor and walkway at Elm Avenue, together with the twenty-foot wide view corridor and walkway at Hart Place, are consistent with the intent of the certified LCP to protect public access and views through the site. Therefore, the permit is conditioned to require the applicant to record a deed restriction that guarantees public access (and signage) on the two north/south walkways that connect to

the proposed east/west promenade on the southern edge of the site (Exhibit #5). The special access limitations for the Grand Prix weekend also apply for the portions of the north/south accessways that are located on the applicant's property. Only as conditioned does the proposed development conform to the requirements of the certified Long Beach LCP.

Any surface parking areas within the Elm Avenue view corridor would not be consistent with the provisions of the certified LCP. The certified LCP prohibits open parking areas on the Ocean Boulevard level.

PD-6 General Development Standards: Parking

(d)3. Open Parking. No open parking shall be permitted at Ocean Boulevard grade. This does not prohibit vehicle drop off or automobile court areas where these areas are specifically permitted.

In this case, parking areas are specifically prohibited within the required view corridors. A vehicular drop-off area is permitted. In order to ensure that the public views through the view corridors are protected, the permit is conditioned to prohibit encroachments, parking areas, or other structures over 42 inches in height within the view corridors. Only as conditioned does the proposed development conform to the requirements of the certified Long Beach LCP.

The City's approval of the site plan and tract map include the provision of a ninety-foot side yard setback on the eastern edge of the site adjacent to Linden Avenue, even though the LCP does not require a setback or view corridor in this location (Exhibit #4). This ninety-foot wide side yard on the eastern side of the project is proposed to be developed with a private swimming pool enclosed by a wall, trellis and lush landscaping. Public access is not allowed within the ninety-foot wide side yard/private swimming pool area. While this ninety-foot wide side yard has been referred to as a view corridor, the only views protected by this setback area would be views from the high-rise apartment buildings located inland of the proposed project. The Ocean Boulevard level development (wall) proposed in the ninety-foot wide side yard area would obstruct any public views that currently exist through the eastern portion of the project site.

Public pedestrian access from Ocean Boulevard to Seaside Way (thirty feet lower in elevation) is provided, as required by the certified LCP, by a public sidewalk along both sides of Linden Avenue (Exhibit #5). As part of the proposed project, the applicant is providing a public stairway to connect the east end of the Ocean Boulevard level east/west walkway to the this sidewalk on the Seaside Way level, thirty feet below.

Pedestrian Bridge

The certified LCP requires the developers of the site to provide for the construction of the promenade (east/west walkway) and public walkways abutting the site and over one-half the width of the public right-of-way necessary to join the promenade to the adjoining property. The certified LCP states:

PD-6 Subarea 9 Specific Development and Use Standards: Access.

(f) Developer On and Off-site Improvements and Maintenance. The developer of all construction of new buildings and of all condominium conversions shall provide for the construction of the promenade and public walkways abutting the site and over one-half the width of the public right-of-way necessary to join the [p]romenade to the adjoining property.

As stated above, the applicant is proposing to provide for the construction of the east/west promenade on the southern edge of the site, north/south public walkways at Hart Place and Elm Avenue, and the public sidewalk abutting the site at Linden Avenue. The LCP requirement for the construction of public walkways over one-half the width of the rights-of-way to join the east/west public promenade to the adjoining properties involves the construction of two pedestrian bridges, each spanning a right-of-way (Hart Place and Linden Avenue) that is about thirty feet lower than the east/west promenade (east/west promenade is at Ocean Boulevard elevation). The LCP requires the applicant to provide for half of each of the two necessary pedestrian bridges: one bridge over Hart Place and one bridge over Linden Avenue. An east/west promenade bridge over Hart Place would link the east/west promenade to the Convention Center, which is public property. An east/west promenade bridge over Linden Avenue would link the east/west promenade to the adjacent property, which is developed with a high-density residential building.

The City's approval of the site plan and tract map includes a condition requiring the applicant meet the above-stated requirement of the certified LCP. In order to meet the requirement, the applicant can actually construct the necessary bridge connections to link the east/west walkway to the adjoining properties, or pay an in lieu fee to the City to be used for the construction. Since the LCP requires the applicant to provide for one-half of the two necessary pedestrian bridges, the in lieu fee payment to the City may be the applicant's preferred choice. The in lieu fee must be paid into a City fund used for the actual construction of the pedestrian bridges over Hart Place and Linden Avenue.

A superior option, in terms of public access benefit, would be for the applicant to actually construct at least one whole pedestrian bridge in order to link the east/west public promenade to one of the abutting properties, either to the east of to the west of the proposed project. The public access benefit would be greater if the bridge over Hart Place was constructed, thereby extending the existing public walkway from the Convention Center plaza (public park) to the east/west promenade proposed along the southern edge of the project site (Exhibit #5). The construction of this bridge and the proposed east/west public promenade would extend the existing public access system about eight hundred feet further eastward than it currently exists. It would also provide a direct pedestrian link to the public areas, arena and theatre located in the Convention Center (Exhibit #2).

Therefore, as required by the certified LCP, the applicant is required to either: A) pay an in lieu fee to the City for the construction of the pedestrian bridges over Hart Place and Linden Avenue, or B) include in the proposed project the construction of a pedestrian bridge over Hart Place, thereby linking the east/west public walkway proposed along the southern edge of the project site to the Convention Center plaza located west of the project site (Exhibit #5). Only as conditioned does the proposed development conform to the requirements of the certified Long Beach LCP.

E. Victory Park Improvements

Victory Park is a dedicated City park, approximately eighty feet in width, situated between the Ocean Boulevard right-of-way and the private properties on the south side of Ocean Boulevard (Exhibit #4). The certified LCP requires that Victory Park shall be preserved as a dedicated City Park, and that all development on the site be set back a minimum of eighty feet from the Ocean Boulevard curbline, or the width of the existing City Park strip, whichever is greater [PD-6 General Development Standards: Building Design].

The City has approved the applicant's request to remove all existing landscaping (mature trees and lawn) from the park area abutting the project and to excavate the parkland in order to accommodate the proposed three-level parking garage which would be partially located beneath Victory Park. This would remove the park from public use for an undetermined amount of time. When the park is finally restored as required by the City, it will no longer have the large shade trees and the character of the park will be changed by the presence of the two proposed 18-story towers. The public would benefit from the exclusive use of 120 public parking spaces in the proposed garage, which is partially located on public property. The amount of underground Victory Park area proposed to be used for the parking garage is equal to 120 parking spaces within the proposed parking garage.

After the park is demolished and excavated, and the proposed parking garage is constructed, the applicant proposes to landscape the top of the garage roof and restore the area as a City park (Exhibit #4). The restored park would be the same elevation as Ocean Boulevard, and be entirely within the eighty-foot setback area provided between the Ocean Boulevard curbline and the proposed towers. The restored park, however, would be bisected by a driveway providing vehicular access to the proposed parking garage. The proposed driveway through the park would occupy the present Elm Avenue right-of-way (Exhibit #4).

The following provision of the certified LCP local approval permits the proposed driveway within the required City Park strip because it specifically states that vehicular access is allowed from Elm Avenue. The driveway would be located on the site of the current Elm Avenue right-of-way, which the City intends to vacate.

> PD-6 Specific Development Standards: Subarea 9 Access
>
> *(b)1. Vehicular Access. All construction of new buildings shall have vehicular access only from Seaside Way and Elm and Linden Avenues. Existing buildings may maintain access from Ocean Boulevard for reuse or conversion to condominium.*

The LCP general prohibition against vehicular access from Ocean Boulevard, which protects Victory Park for public recreation uses rather than for private vehicular uses, does not apply in this case. The certified LCP allows vehicular access to the site from the Elm Avenue right-of-way. Since vehicular access already exists on the Elm Avenue right-of-way, the proposed project's driveway (from Ocean Boulevard) will not displace any currently existing portion of Victory Park (Exhibits #3&4). Therefore, the proposed Elm Avenue driveway is consistent with the certified LCP.

The certified Long Beach LCP protects Victory Park and all other dedicated parks within the City's coastal zone. The proposed project complies with the following policy by restoring and preserving the park as a public park. The proposed project will not result in any permanent loss of public parkland.

The certified LCP Park Dedication Policy states:

> *No parkland which has been dedicated or designated within the coastal zone shall be committed to another use unless the City replaces such parkland on an acre-for-acre basis within or adjacent to the coastal zone with the approval of the California Coastal Commission. Such replacement parkland must provide similar recreational opportunities and be accessible to the same population through private or affordable public transportation. Replacement parkland shall also be dedicated or designated in perpetuity.*

Special Condition Three requires the applicant to restore Victory Park as follows:

A) The proposed condominium towers and all proposed private improvements, except for underground parking located entirely below the elevation of Ocean Boulevard, shall be set back a minimum of eighty feet (80') from the current southern curbline of Ocean Boulevard. Encroachments onto or over any portion of Victory Park are prohibited unless specifically permitted by a coastal development permit. Prohibited encroachments include, but are not limited to: gates, fences, walls, signs, tables, chairs, displays, merchandise racks, and roof overhangs. Public benches are permitted and encouraged.

B) The proposed Victory Park improvements shall be constructed concurrent with, the construction of the proposed condominium units. The proposed Victory Park improvements shall be completed, verified by the City as being in compliance with the Victory Park guidelines, and open for use by the general public, prior to occupancy of the proposed residential units. Subsequent to the completion of the proposed improvements to Victory Park, the permittee, its agents, managers, and sublessees shall not block or interfere with public access to and use of Victory Park at any time.

In addition, Special Condition two requires the applicants to segregate and manage the 120 public parking spaces in a manner which will prevent resident and guest use of the public parking (e.g. charge fees for public parking and prohibit overnight vehicle storage). The use of the underground area of the park for a parking garage is permissible because much-needed public parking facilities will be provided without any loss to the amount of Victory Park area that is available for public recreation.

As conditioned, Victory Park will be restored and will remain a public park as required by the certified LCP. Therefore, the proposed project complies with the requirements of the certified Long Beach LCP.

F. California Environmental Quality Act

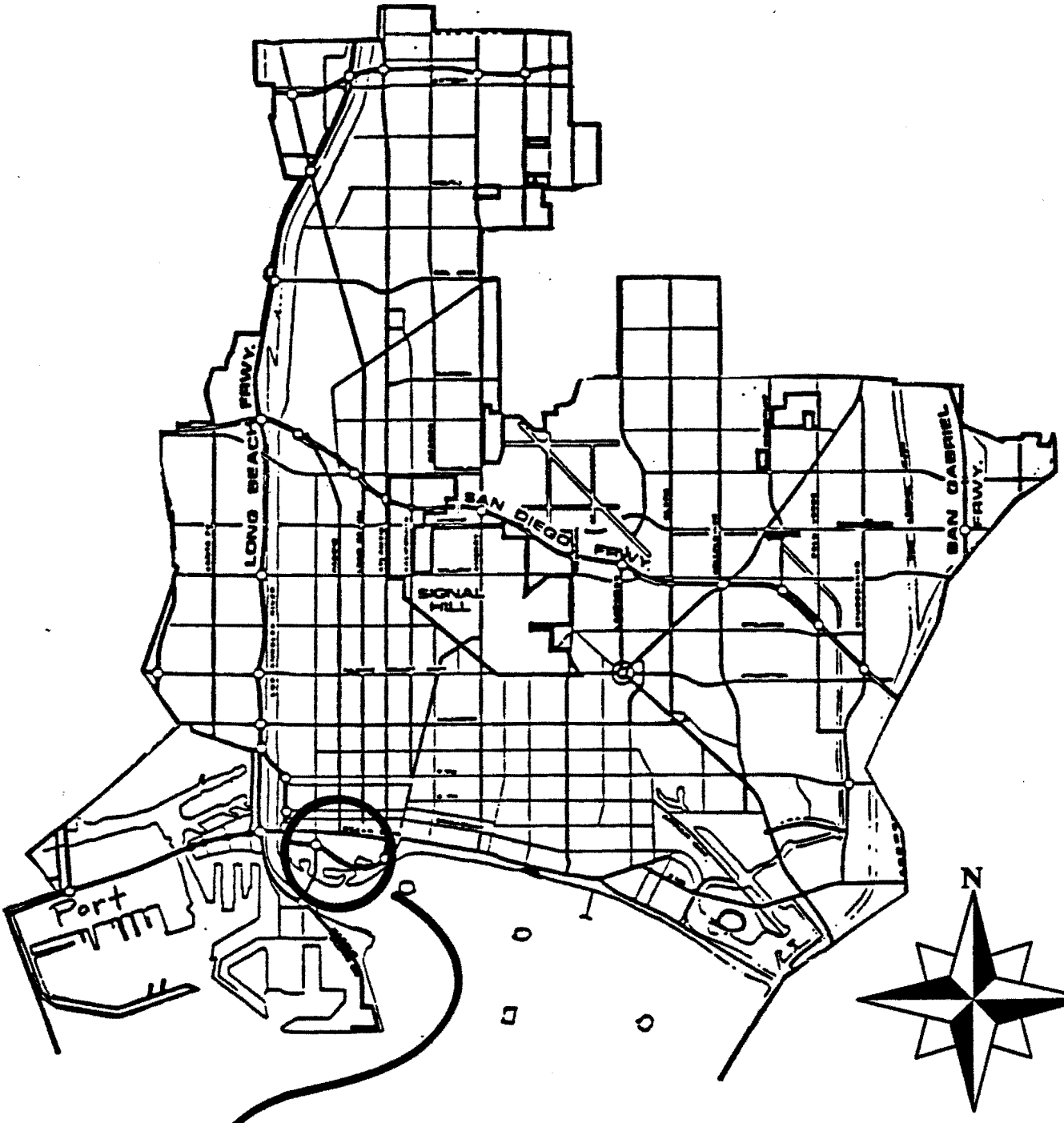
Section 13096 Title 14 of the California Code of Regulations requires Commission approval of a coastal development permit application to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

Two feasible alternatives have been considered: 1) provide the 1,205 on-site parking spaces as required by the parking standard of the certified LCP (197 more spaces than currently proposed), and 2) reduce the density of the proposed project so the ratio of the proposed 888 on-site parking spaces and number residential units is consistent with the parking standard of the certified LCP. The alternative to add more parking was rejected because that would require the proposed parking structure to exceed the elevation of Ocean Boulevard, which would result in negative impacts to visual resources in violation of the certified LCP. The alternative to reduce the proposed residential density has been rejected as unnecessary because the currently proposed project, as conditioned, would not result in any adverse effects on the environment.

The proposed project, as conditioned, has been found to be consistent with the certified Long Beach LCP. All adverse impacts have been minimized by the recommended conditions of approval and there are no feasible alternatives or additional feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project can be found consistent with the requirements of the Coastal Act to conform to CEQA.

End/cp

City of Long Beach

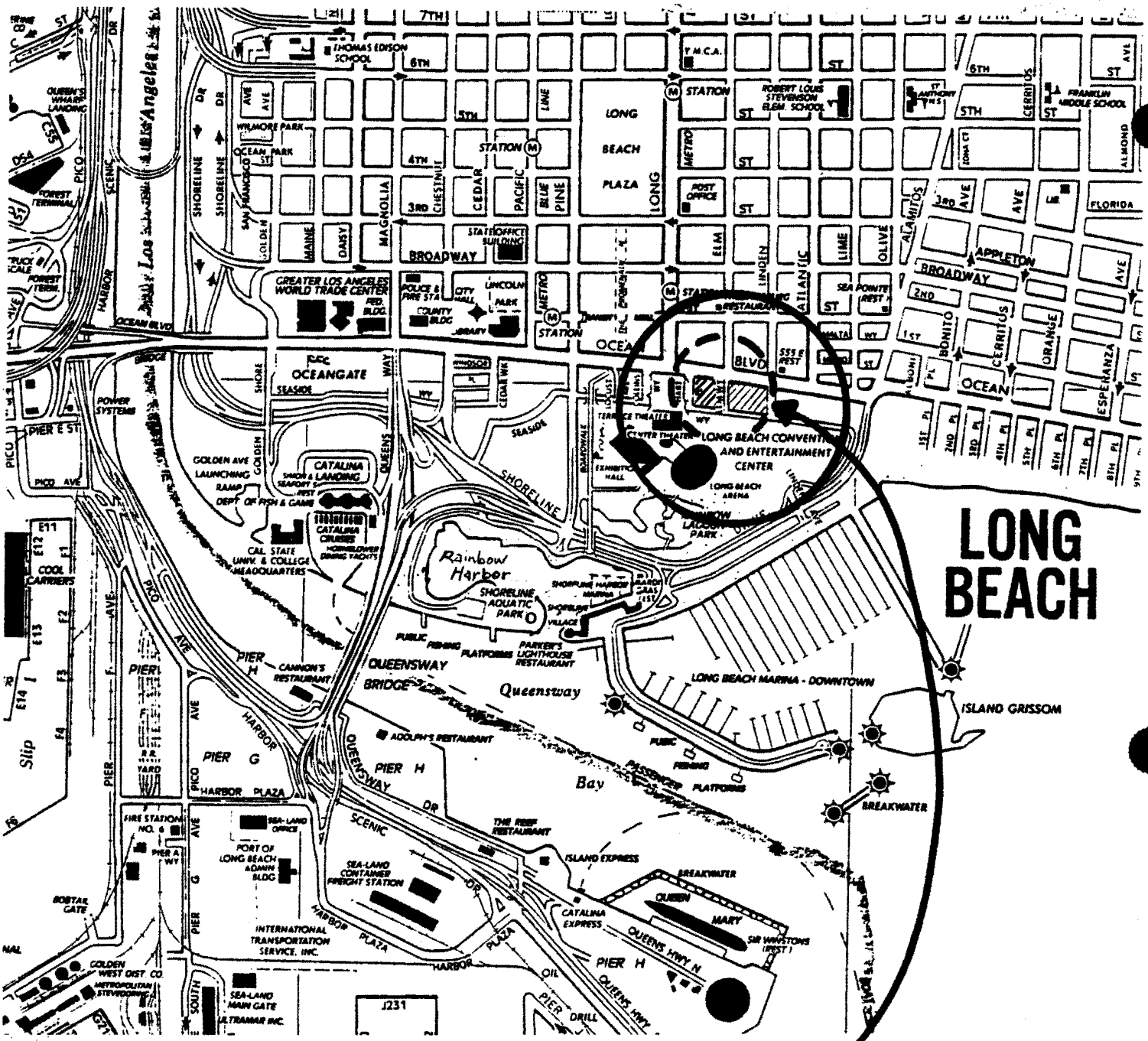


Site

COASTAL COMMISSION
A5-LOB-01-111

EXHIBIT # 1

PAGE 1 OF 1



COASTAL COMMISSION
A5-LOB-01-111

EXHIBIT # 2

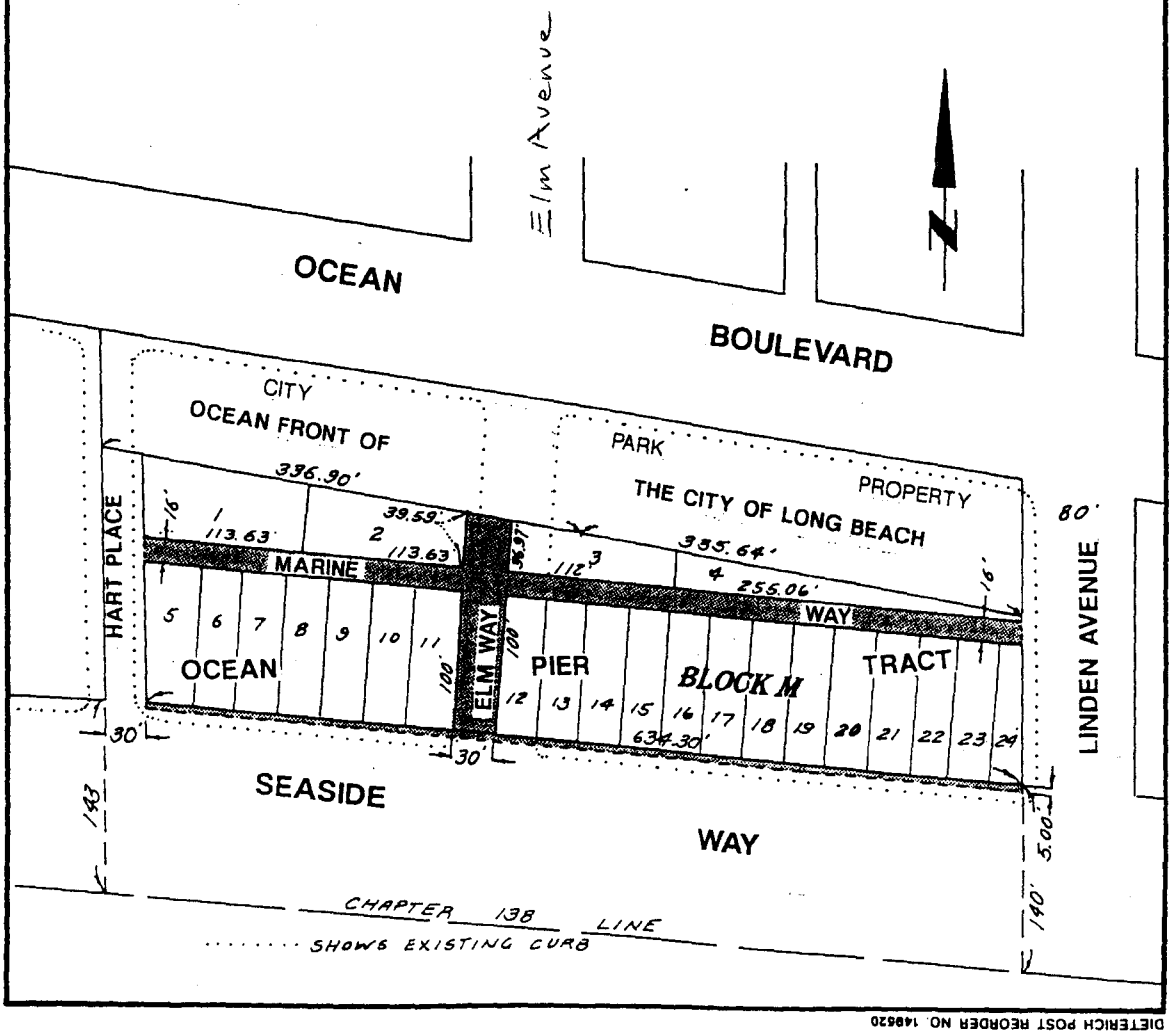
PAGE 1 OF 1

926V

SKETCH SHOWING ELM WAY, MARINE WAY, AND A PORTION OF SEASIDE WAY BETWEEN HART PLACE AND LINDEN AVENUE TO BE VACATED BY THE CITY OF LONG BEACH.

SHOWS PORTIONS TO BE VACATED

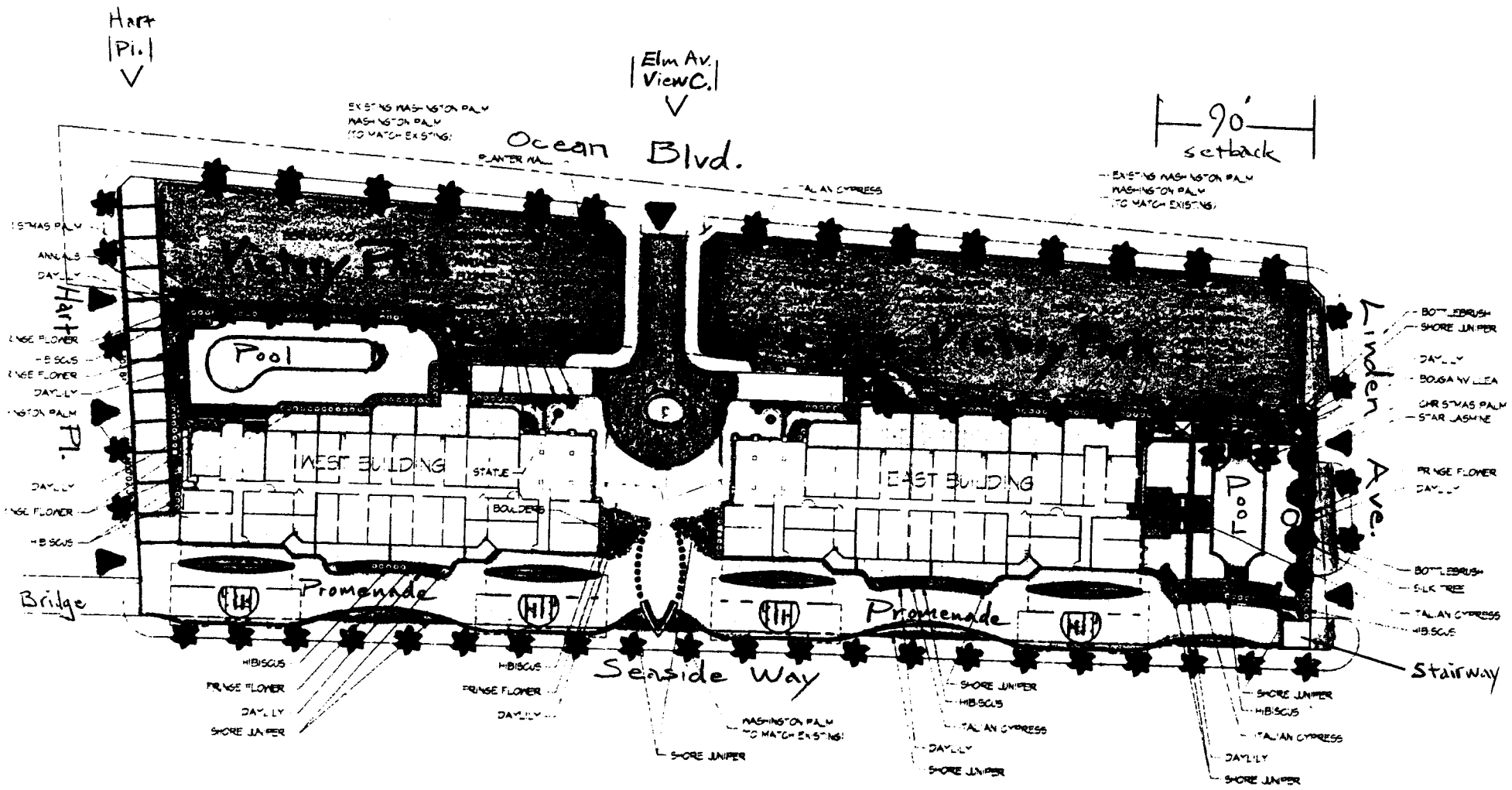
ENGINEERING BUREAU
CITY OF LONG BEACH, CALIFORNIA



DIETERICH POST REORDER NO. 14862O

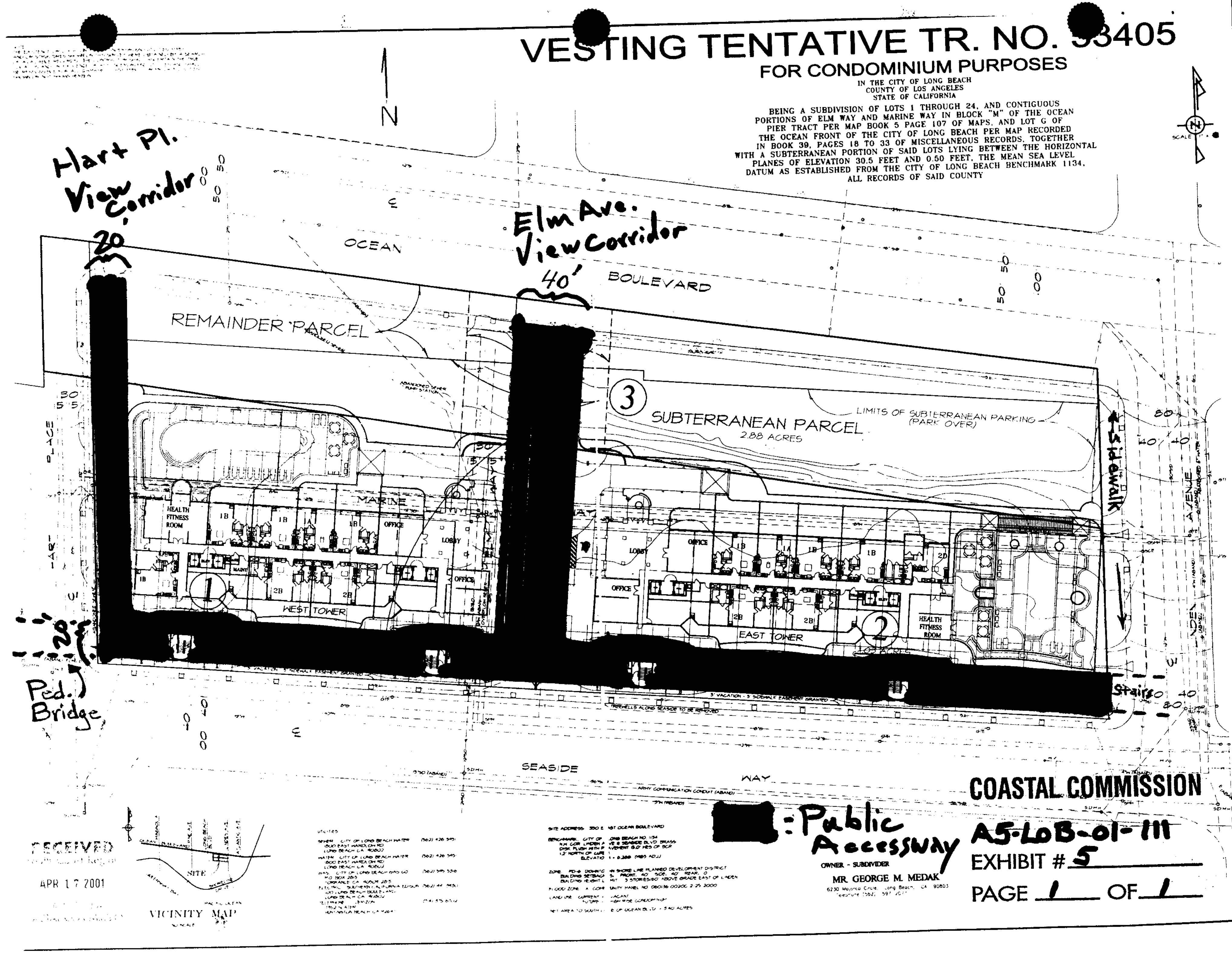
EXHIBIT

Site Plan



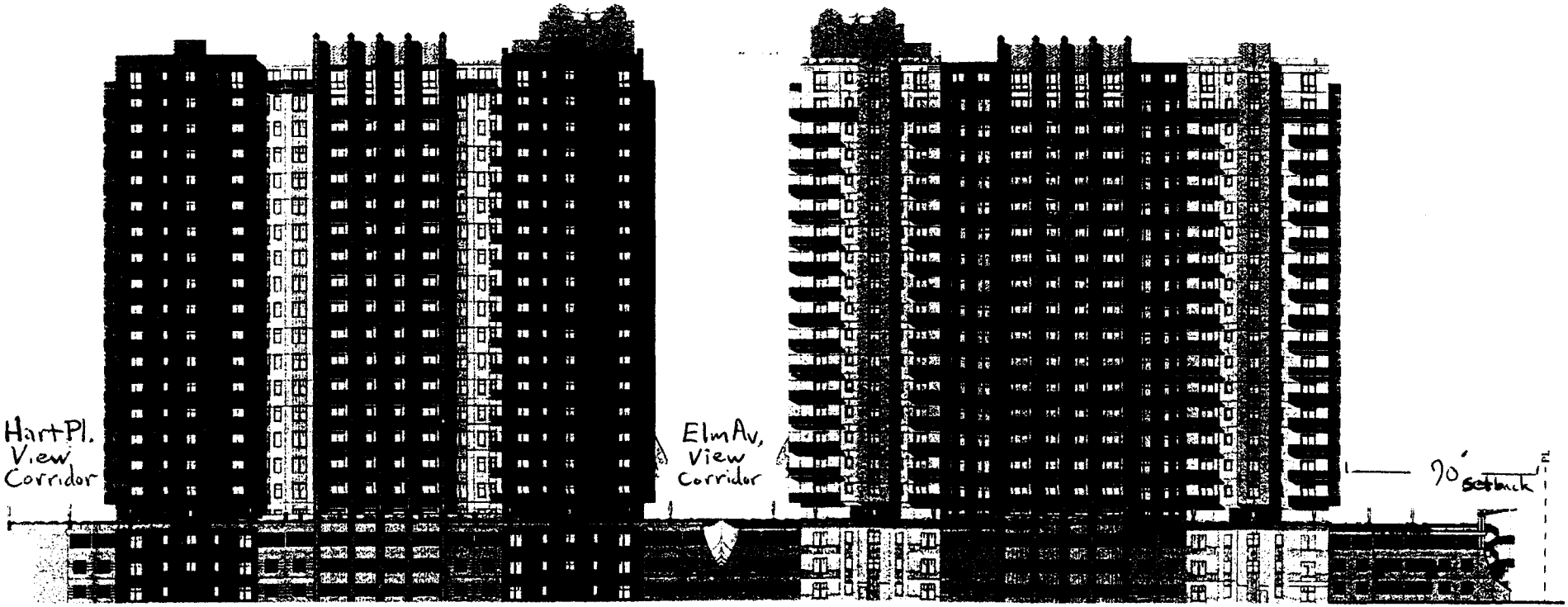
▶ : Garage entry/exit

COASTAL COMMISSION
A5-LOB-01-111
EXHIBIT # 4
PAGE 1 OF 1


VESTING TENTATIVE TR. NO. 53405
FOR CONDOMINIUM PURPOSES
IN THE CITY OF LONG BEACH
COUNTY OF LOS ANGELES
STATE OF CALIFORNIA
BEING A SUBDIVISION OF LOTS 1 THROUGH 24, AND CONTIGUOUS PORTIONS OF ELM WAY AND MARINE WAY IN BLOCK "M" OF THE OCEAN PIER TRACT PER MAP BOOK 5 PAGE 107 OF MAPS, AND LOT G OF THE OCEAN FRONT OF THE CITY OF LONG BEACH PER MAP RECORDED IN BOOK 39, PAGES 18 TO 33 OF MISCELLANEOUS RECORDS, TOGETHER WITH A SUBTERRANEAN PORTION OF SAID LOTS LYING BETWEEN THE HORIZONTAL PLANES OF ELEVATION 30.5 FEET AND 0.50 FEET, THE MEAN SEA LEVEL DATUM AS ESTABLISHED FROM THE CITY OF LONG BEACH BENCHMARK 1134, ALL RECORDS OF SAID COUNTY
N
Hart Pl. View Corridor
20'
Elm Ave. View Corridor
40'
OCEAN
BOULEVARD
REMAINDER PARCEL
3
SUBTERRANEAN PARCEL
2.88 ACRES
LIMITS OF SUBTERRANEAN PARKING (PARK OVER)
Sidewalk
HEALTH FITNESS ROOM
MARINE
LOBBY
OFFICE
1
WEST TOWER
2
EAST TOWER
HEALTH FITNESS ROOM
Ped. Bridge
Stairs
SEASIDE
WAY
COASTAL COMMISSION
A5-LOB-01-111
EXHIBIT # 5
PAGE 1 OF 1
: Public Accessway
OWNER - SUBDIVIDER
MR. GEORGE M. MEDAK
RECEIVED
APR 17 2001
VICINITY MAP
SITE

West Tower

East Tower

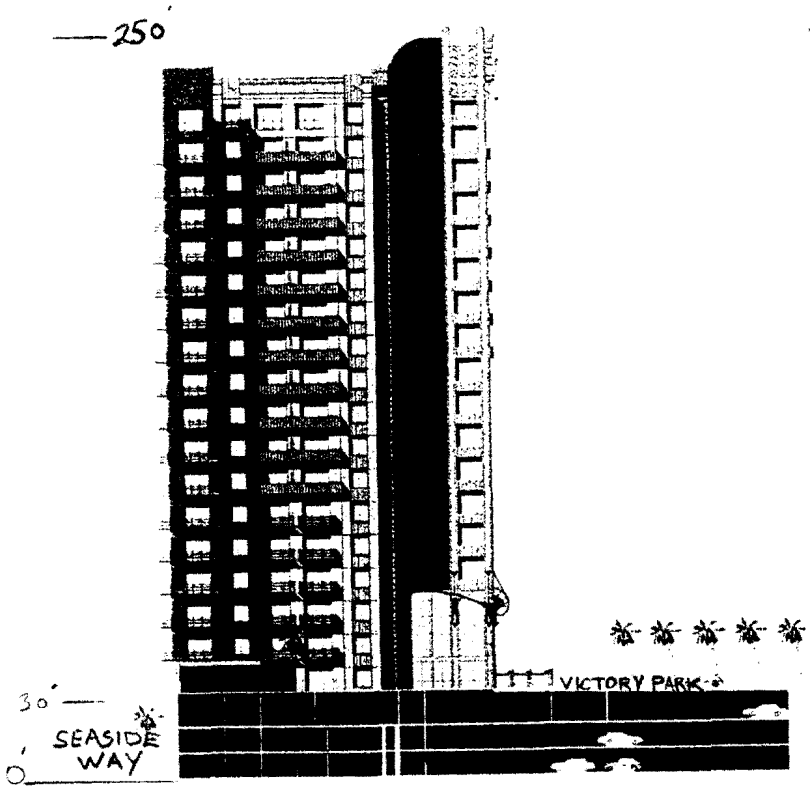


South Elevation

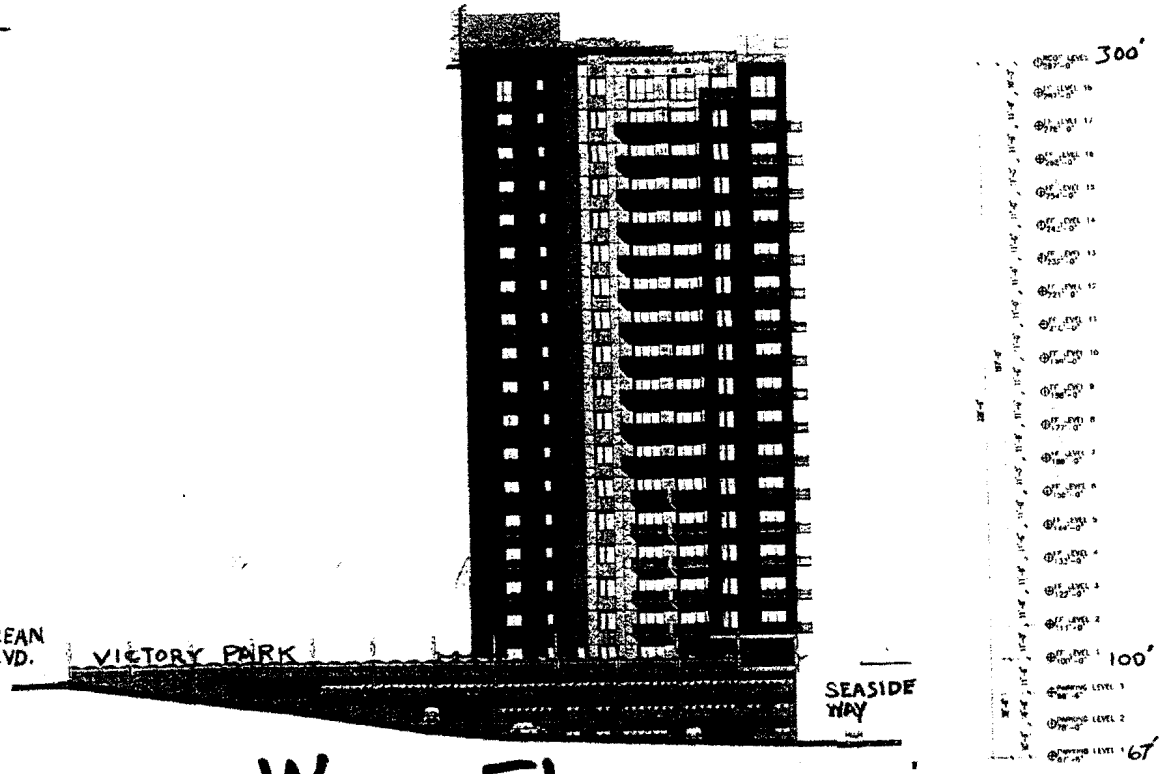
COASTAL COMMISSION
A5-LOB-01-111

EXHIBIT # 6

PAGE 1 OF 2



East Elevation



West Elev.

COASTAL COMMISSION
A5-LOB-01-111

EXHIBIT # 6

PAGE 2 OF 2

20 March 2001

Mayor and Councilmembers:

I have lived in the Long Beach area most of my life and have resided in the downtown area (East Village) for the past 12 years. Twelve years ago, living downtown was a questionable proposition; in fact many of my friends and associates did not understand the potential of the area.

However, in those twelve years, downtown and the East Village have blossomed into an area that has become desirable to both live and work. I've seen development improve the area for the better, however with these improvements come more people, traffic and congestion. East Village is still a great place to live even with the current congestion problems, I and my neighbors would all agree that we are not against continued development of the area, but we want to insure that it is done wisely as the decisions made today may adversely affect our quality of life tomorrow.

I reviewed the Site Plan Review for the project located at 350 East Ocean Boulevard and in summary found the following problems:

Page 1, Item 3 (Reason for Recommendation): states "The requested Standard Variances are relatively minor and will not create negative impacts on adjacent land uses. Off-street parking for residents and guests is sufficient as discussed in Negative Declaration No. 42-00 and the parking study prepared by Kaku and Associates.

Not only is this statement untrue but I believe that the Kaku and Associates study is flawed because it does not take into account the following facts:

1. **The parking study looked only at parking during a non peak time of the year December. If a parking study is to be valid it must account for those times of the year when parking is at it's maximum. Based on selling prices of units in surrounding buildings I would assume that individuals or couples who buy these new units are not big users of public transportation and will therefore will have an impact on parking in the area**
2. **The Lafayette building with more than 150 units has no parking.**
3. **The Cooper Arms with 159 units has no parking.**
4. **The building on Ocean at Atlantic has no parking.**
5. **The Villa Riviera has very limited parking and is insufficient for the size of the building.**
6. **Many other residential units in the area have no parking.**

Consequently most of these people must park on the street or in paid parking structures (many are not open to public access 24/7). Parking is tight during the week, but on weekends it is even worse because:

A. **There are (4) major buildings in the area with no parking.**
B. **During the summer months tourism increases the parking density.**
C. **The myriad of movie filming done downtown.**
D. **During the week and on weekends people attending the convention center and the sports arena functions utilize street parking so as not to have to pay the parking fees at the convention center.**
E. **The Grand Prix which eliminates our use of parking for full four days as well as the set up and take down time for this event which takes months.**
F. **The numerous festivals throughout the year.**

Page 1, Item 2 (Reason for Recommendation): The last line states "... and restores and maintains Victory Park for use by the public".

All of the beautiful trees that have grown in Victory Park for years are to be destroyed with the only thing left being the palm trees which will have to be placed in pots. Potted trees do not grow large or lush. In addition, this space is more transitional (moving) than a park (sitting). Rather than a comfortable park this will become an austere area, and makes a statement that is only there to compliment someone else's architecture. Also, not only are we losing the park area will also lose the view of the world's largest circular Wylan mural on the sports arena. This has become a landmark in Long Beach.

My recommendation is that the council re-look at the impact that the new structure is making on the identity and personality of Long Beach and the East Village.

Page 2, Item 4 (Reason for Recommendation): states "The proposed building design is attractive,...."

I've review the building design and although it does have some interesting details which are in keeping with the history of Long Beach, the color and materials really need to be re-assessed as they are not in keeping with the personality of the downtown area. One might expect to see these colors and materials on a building in Miami not in Long Beach.

My recommendation is to use more neutral tones, and add the colors as accents.

Page 5 Traffic, Circulation and Parking(Paragraph 1): states "The traffic mitigation includes removal of curb side parking on Ocean Boulevard along the project frontage during the afternoon peak hour to provide an additional through lane eastbound traffic on Ocean Boulevard.

Again, taking parking off of Ocean anytime will create major parking problems for the adjacent residents. In addition, consider that on street sweeping day we may have to park blocks from our homes because 50% of the parking is unavailable,

unless one wants to awake at 4:00 am to move the car. The developer has given no consideration to those businesses on Ocean Blvd that need this parking area for their customers.

My recommendation is that parking NOT be removed or restricted on Ocean Boulevard and that access to the project should be on Linden, Hart or Seaside Way. This is similar to the building directly to the east of the project.

Page 5 Traffic, Circulation and Parking (Paragraph 3): PD-6 establishes a parking requirement of two parking spaces per unit plus one space for every six units for guest parking.

The calculation for this project is as follows:

556 units x 2 spaces = 1,112 spaces
556 units / 6 spaces = 93 spaces

Total Spaces Required 1,205

This project only provides 1008 spaces total available for parking. This will add 223 cars onto the adjacent street parking.

Again, on street sweeping day, the additional cars will exacerbate the parking problem.

Page 5, Traffic, Circulation and Parking (Paragraph 5): "The driveway access on to Hart Place has not been fully resolved."

This needs to be resolved prior to any approvals as it will impact the neighborhood, traffic and parking.

Page 6 Landscaping (Paragraph 1): All on-site landscaping will be in containers, limiting to some extent the size and variety of plant materials that can be used.

Again, this creates problems in NOT creating a park-like atmosphere in Victory Park.

Page 6 Current Action Requested (Item 1): "Allow 1,008 parking spaces, plus 4 tandem spaces..."

My recommendation is that the required amount of parking be met so as not to adversely impact our neighorhood.

Page 6 Current Action Requested (Item 2): "Allow a driveway on Ocean Boulevard...."

My recommendation is to not allow access on Ocean thus eliminating parking and creating problems and also eliminate the restriction of parking in the early and evening hours.

Page 7, Current Action Requested (items 3 and 4): "Allow driveways on Hart Place and Linden that are 25'-0" from Seaside Way,..." and "Allow the pedestrian walkway along Hart Place to be 20'-0" in width (instead of not less than 30'-0" as required by PD-6)."

More study should be put into the actual impact these requests will have on parking, traffic and the overall neighborhood.

Page 10, Local Coastal Development Permit Findings (item A, paragraph 1): States "All buildings shall be arranged on their sites so as to provide views between the buildings, so as to avoid the impression of a wall of buildings, so as to minimize blocking shoreline views of other buildings, and so as to entice pedestrians into the shoreline area."

Are we not losing the view of the Sports Arena, The Queen Mary? This structure is TWO BLOCKS LONG, if this is not a wall I would like someone to define wall for me!

Page 10 Local Coastal Development Permit Findings (item A, paragraph 1): States "PD-6 also calls for "dense residential" and establishes a maximum density of 250 dwelling units per acre...."

This project sits on 2.2 acres of land which calculates to maximum of 550 units as opposed to 556 units.

General Parking: The East Village currently has parking problems as well as the adjacent Alamitos beach area. In fact, in a letter written by vice mayor Dan Baker to the Grunion Gazette dated March 8th, 2001, the following:

"As everyone in Alamitos Beach knows, parking is one of our biggest neighborhood concerns. I am pleased to report that a partnership with my Parking Advisory Committee has resulted in the creation of more than 300 new parking spaces for residents in this area. **While finding parking spaces is still difficult at times**, we have added new diagonal spaces, reduced and removed red zones and opened existing lots to accommodate overnight permit parking"

In closing, I implore you, the Mayor and City Council, to act responsibly and insure that that wise planning will be used when further developing the East Village and adjacent areas.

Thank you.

Dennis Apodaca
425 East Ocean

DONALD SNOW
ARCHITECT
425 East Ocean Blvd., Unit 410
Long Beach, CA 90802
(562) 4322223

MY CONCERNS REGARDING THE PROPOSED DEVELOPMENT ARE BRIEFLY SUMMARIZED AS FOLLOWS:

- There is a beautiful, tree filled public park on the property. Some of the canopy shade trees are at least 70 years old. The proposed development would destroy these trees and install container planting because all landscaping would be on top of a concrete parking garage.

- The park is home to families of ground squirrels. I see people bringing food and feeding them daily. On weekends, children also enjoy this unique delight. The proposed development would eliminate this very special downtown experience.

- One of the City's written guidelines for the appropriate development of the property states that there shall be a minimum obstruction of the views toward the ocean and the Queen Mary. This is the only remaining property where these views can be enjoyed by visitors and locals traveling along Ocean Blvd.; the most picturesque street in Long Beach because of its proximity to the ocean. The proposed development is an 18 story wall of construction.

- The California Costal Commission, in a letter to the City requested an additional 200 cars be provided. Parking is drastically insufficient in this area. The developer hired a traffic consultant to justify this insufficiency. Over the years, I have hired traffic consultants on many projects. Their methods and conclusions can be shaped as required. The proposed development has completely ignored the California Costal Commission's request.

- No Environmental Impact Report was required.

- I purchased my home in this area knowing that the public park property in question was owned by the City, and fully believing that the governing agencies having jurisdiction over it would be sensitive enough to insure its unique characteristics would be maintained.

Thank you very much for considering my concerns.

Donald Snow

COASTAL COMMISSION

EXHIBIT # 8

PAGE 1 OF 1

AFFILIATED DEVELOPMENT GROUP, Inc.
Real Estate Development Services

6230 Majorca Circle
Long Beach, California 90803
(562) 597-2077 FAX (562) 597-1369

Hand Delivered

April 16, 2001

Charles R. Posner
Coastal Program Analyst
California Coastal Commission
200 Oceangate, 10th Floor
Long Beach, California 90802

Re:Case No. 0012-20
Ocean Villas - 350 Ocean Boulevard, Long Beach

Dear Chuck,

Thank you for the time and consideration given by you and Pam Emerson last Thursday afternoon reviewing the Ocean Villas project in downtown Long Beach. This letter is intended to respond to the questions that were outstanding from our meeting and to respond to the items for which additional information or confirmation was requested. Those items, responded to in the paragraphs below include:

- Victory Park Development Plan
- Roadway Vacation Status
- Elm Way Access
- Parking Space Allocations
- City Codes for Home Based Businesses
- Density Calculations

Victory Park Development Plan

Enclosed please find a set of detailed landscape drawings for the proposed Victory Park plan prepared by EDI Architecture, the project architect. The plan has been developed in concert with and reviewed by staff of the Long Beach Department of Parks, Recreation and Marine to ensure compliance with the approved Victory Park Guidelines. The only matter yet to be resolved is the exact design and placement of the Victory Park identification signs in accordance with City requirements.

The plan clearly identifies public walkways, benches, and drinking fountains. As can be seen from the drawing that illustrates the current condition of Victory Park, the new park will not only be slightly enlarged, but will also remove the large trees and concrete driveways that inhibit the use of the property and limit open space. Please note that the landscape plans also provide detail regarding the other significant public area, the Promenade, that will ultimately connect to the north/south Promenade on the west side of the Convention Center that extends from City Place to Shoreline Village on the water.

City staff is prepared to submit and recommend approval of the proposed Victory Park development plans before the Recreation Commission at its regular monthly meeting scheduled for June 17, 2001.

Roadway Vacation Status

Vacations require a Finding of General Plan Consistency by the Planning Commission. In a report to the Commission dated February 15, 2001, staff concluded, "These vacations are necessary both to consolidate the underlying lots and in order to accommodate the residential density allowed for by PD 6, and thus are in conformance with the goals and policies of the General Plan". The Planning Commission unanimously approved the vacation request as a part of overall approval for the project on February 15, 2001.

The City Council will act on a Resolution of Intention to vacate Elm Way, Marine Way and a portion of Seaside Way between Hart Place and Linden Avenue at its regular meeting of April 17, 2001. Approval of the resolution will set a public hearing on the matter at 5:00 PM on Tuesday, May 15, 2001. A copy of the agenda item, staff report and illustrative maps are enclosed for your review.

Elm Way Access

The portion of Elm Way that crosses Victory Park immediately north of the development property line will not be vacated and remain as a public access easement to the site, even though it will be maintained by the developer/property owner. PD-6 requires that the property be accessed only from Hart Place, Linden Avenue and Seaside Way. The City has recognized that Hart Place and Linden Avenue are

severely sloped and Seaside Way is not accessible during the Toyota Grand Prix of Long Beach. Accordingly, the City desires to maintain the current signalized intersection at Elm Avenue for access to the property from both the easterly and westerly directions on Ocean Boulevard, particularly for public parking that will be provided on the site.

Parking Space Allocations

The proposed parking plan approved by the Planning Commission and the City Council provides 1,008 parking spaces plus 4 tandem stalls for a total of 1,012. Since approval of the project by the City of Long Beach the top two floors have been slightly modified for structural purposes and the number of two and three bedroom units has been reduced and number of one bedroom units increased to make up the difference. The new ratios result in spaces being allocated according to the following chart.

Unit Type	Number	Spaces Allocated	Per Unit
3 Bedrooms	8	16	2
2 Bedrooms	251	502	2
1 Bedroom	77	154	2
1 Bedroom	220	220	1
Guest/Public	___	120	___
Total	**556**	**1,012**	**1.82**

The above table shows that the development will provide sufficient parking for 26% of the one-bedroom units to have access to two parking spaces. A detailed Traffic Impact Analysis prepared by Kaku & Associates included a survey of several other large multi-family residential properties along the Ocean Boulevard corridor in or near downtown Long Beach. That study, a copy of which was forwarded to your offices by the Long Beach, concluded that a maximum of 1.59 parking spaces per dwelling unit was observed in use during peak parking periods. Given the level of parking proposed for the Ocean Villas development, a level slightly higher than that standard is provided even if all public spaces were to be in use at any given time.

Moreover, given the fact that the Long Beach Transit Mall with connection to the Blue Line is slightly more than one city block from the property, the City of Long Beach and the developer are quite comfortable that the number of spaces provided will adequately serve the residents, guests and the public. The development of additional spaces may actually result in the development of parking spaces that will not be used.

City Codes for Home Based Businesses

Home occupations and businesses are governed by Long Beach Municipal Code Section 21.51.235, a copy of which is enclosed for your review. Please note that the restrictions include limits on parking, deliveries and other activities that would alter the nature of any residential property.

Density Calculations

Hall & Foreman, the project Civil Engineer performed an ALTA survey of the site and calculated the total square footage of the property, which was reviewed and verified by the Long Beach Department of Public Works, Engineering Division.. The total site, including approved vacations, is 2.226 acres. Based upon the allowable density of 250 units per acre, the City determined that 556 dwelling units can be permitted for development on the property.

Thank you for the opportunity to provide this information and we are prepared to respond immediately to any additional questions or concerns that may arise.

Sincerely,

George Medak
Principal

Copy: Pam Emerson
Gordon Ip
Melvin Nutter, Esq.

April 26, 2001

To The Coastal Commission: RE: 350 E Ocean, Long Beach project, A5LOB01111

I am a current homeowner of the Cooper Arms at 455 East Ocean, and I am in favor of the above project. This is what we've been waiting for in the downtown area- high-end developments. Long Beach is a beautiful beach city, therefore, it is just fitting to promote this kind of projects in the city.

I am in support and I encourage all of you to vote YES to this project.

Sincerely yours,

Norma V. Kast, RN, MSN, CNOR

Re: Appeal A-5-LOB-01-111

455 East Ocean Blvd., # 506
Long Beach, Ca 90802
Phone (916) 322 1677

May 12, 2001

Long Beach City Council Members
City Hall Plaza Level
333 W. Ocean Boulevard
Long Beach, California, 90802

Re: Resolution No. C-27829

Dear Long Beach City Council Members:

I am writing to voice my opposition to Resolution No. C-27829, Intention to Vacate Elm Way, Marine Way, and a portion of Seaside Way between Hart Place and Linden Avenue. (District 2).

My opposition is based on my interest in preserving and enhancing Victory Park. Rather than releasing these properties from public use to private development, I urge that they be used to augment Victory Park, through land swap and consolidation. The rationale for such actions include:

- To rectify former "takings" from the park, as detailed below.
- To comply with requirements of the California Coastal Act, as detailed below.
- To comply with requirements of the Local Coastal Plan, as detailed below.
- To comply with the Victory Park guidelines, as detailed below.

Quoting from the "Victory Park Design Guidelines" of October 26, 1989, "Victory Park was deeded to the City in 1889. Since that time the area has historically served as the front yard to the Long Beach Central Business District." This park area is the last significant "key hole" which gives Ocean Blvd. drivers and pedestrians, and the surrounding downtown area a magnificent view of Long Beach landmarks such as the Pacific, the Queen Mary, the Wyland Whales mural, and the marina. Victory Park has historic status, an urban location, proximity to significant lower-income neighborhoods per data from the US Census, and location adjacent to California Coastal Commission protected lands

However, according to archival news articles, over the years the park has experienced development "takings." For example, a strip of approximately 15 feet was "shaved" off during the broadening of Ocean Blvd. Rather than vacation, these public lands should be used to mitigate this prior action.

The California Coastal Act (Public Resources Code, Division 20) Section 30252 states that "The location and amount of new development should maintain and enhance public access to the coast by ... (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development." The additional 566 residential units anticipated by the development will overload the existing bluff park. Rather than vacation, these public lands should be used to mitigate this proposed development, in compliance with the requirements of the California Coastal Act.

Ordinance no C-7637, the Downtown Shoreline Planned Development District, under. General Development and Use Standards, part "c.4" stipulates development set back from Ocean Blvd., and preservation of Victory Park. Parcels H-350 and H-353, part of the City Park strip width, create a deep park land set back. Rather than vacation, these public lands should be used to augment the park.

Victory Park Design Guidelines, October 26, 1989 prohibit all new driveways and parking at grade. The vacation of Elm Way, per the proposed development plans, would create these new prohibited used.

Your attention to these concerns is appreciated.

Sincerely

Ron Selge

Cc: California Coastal Commission
Selected Community Groups and Individuals

MARIE BACONAWA
Post Office Box 90592
Long Beach, CA 90809-0592
(310)669-4536

April 25, 2001

Chuck Posner, Coastal Program Analyst
California Coastal Commission
South Coast Area
PO Box 1450
200 Oceangate, 10th Floor
Long Beach, CA 90802-4416

RE: 350 E. Ocean Blvd., A-5-LOB-01-111, Item No. M12a

Dear Mr. Posner and Coastal Commission:

I am writing to support the 350 E. Ocean project. I am enclosing a copy of the letter I wrote to the Long Beach City Council, in favor of the construction of these two (2) 18-story condominium community in downtown Long Beach.

The applicant, Genesis Real Estate Group and George Medak, have been very generous and accommodating to our community by taking the time to share this project with us, prior to the Planning Commission hearing in Long Beach. I have seen the full presentation when it was presented before the Planning Commission. This is a project that will support the downtown area's needs to fulfill its intention for economic growth in our downtown district. I see no harm or environmental impact with the construction of this beautiful project.

I am a homeowner and a Board member of 3 years, of the Historic Cooper Arms, located across where the condominium project will be built. I am in favor of the project, and I am giving my full support to everyone involved in this project. I invite you to consider giving it your full support, as well.

Thank you for your time.

Sincerely,

MARIE BACONAWA
Homeowner & Board Member
The Historic Cooper Arms
455 E. Ocean Blvd.,
Long Beach, CA 90802

MARIE BACONAWA
Post Office Box 90592
Long Beach, CA 90809-0592
(310) 669-4536

07 March 2001

Long Beach City Council
% Ms. Shelba Powell, City Clerk
Plaza Level City Hall
333 West Ocean Blvd.
Long Beach, CA 90802

RE: 350 E Ocean Development, OCEAN VILLAS

Dear Long Beach City Council and Ms. Powell:

I am a current homeowner and a Board Member of three years, of the Cooper Arms. In 1995, I worked as the general manager of the Association. At that time, there was an influx of drugs and prostitution in the building. The Long Beach Police Department was a frequent visitor to the COOPER. Rents ranges from $300 to $400 for studios and $500 to $650 for one bedrooms (most have ocean views and balconies), with utilities included. Units were selling for as low as $8,000 to less than $20,000, for studios and less than $50,000 for one bedrooms.

Hard work, commitment, pro bono hours, and a small, devoted staff, and, the very few that supported the vision, took a stand to make the Cooper Arms a great place to live. Within three months, the drugs, prostitution and the troublesome residents were all out by Christmas 1995. From 1996 through early 1998, as the general manager, I started to communicate and write to absentee owners, who rents their units, to tenants that I know were not paying rent. I took responsibility by letting them know of their tenant's whereabouts in writing. My staff and I, also began documenting incidents, nuisances, etc., by giving notices, violations, and warning notices to homeowners and renters. Homeowners were cited and fined. Our staff worked very hard to keep the building clean, free of drugs and prostitution, and offer our residents the peace and enjoyment they deserve living in our community. During this process, we, (staff) were constantly criticized and harassed because of all the changes being implemented. By Christmas 1995, we have produced milestones and extraordinary results in our community. We were attracting quality residents in our community that pays their rents on time. Our staff received generous gifts, and, an office full of Christmas cards and thanks from the residents. The breakthrough result was, the residents saw, that, having a structure, with a set of rules and regulations to follow, was to everyone's

advantage. By then, the building was beginning to show a lot of improvements. Rents and property values started to climb. Everyone was participating. The building was full of possibilities. There were social events, parties and gatherings for the community to promote camaraderie in the building. The point is, it was hard work and commitment that made the Cooper Arms where it is today. This was created by the very few that truly cared and saw the vision of the Cooper Arms in the millenium.

I share these things with you, so you can get a sense of where the Cooper Arms was in 1995, to the present time. Today, studios rent as high as $875 per month and one bedrooms for $1,100 per month. Sales are on the up and up. The economy helped and provided other financing options for the building. No lender would risk financing our building before. Units sold had to be either financed by the owner, or purchased in cash. In 1996, 1997 and early 1998, the building started to have huge breakthroughs in sale price(s). These breakthroughs happened with cooperation from lenders, appraisers, and, most importantly, selling the building and promoting downtown "New York" living, and the promise of new growth and success of downtown Long Beach. The City Council and the leaders of Long Beach made these successes and accomplishments happen. So, I acknowledge your hard work and commitment to our city.

The Cooper Arms was a multi-million dollar development in the 1920's. It still is, in the millenium. There are some owners that thinks that it should offer affordable housing. For an ocean front property and a Southern California location, I could never comprehend this way of thinking, even way back in 1995. The point is, the 350 E Ocean development will provide the Cooper Arms (and other surrounding developments) the following benefits and advantages:

1. The property values will increase with a high-end, quality development and enhance the neighborhood.

2. Economic growth and impact in the downtown area due to:

   a. An additional 556 new customers for our commercial tenants and the surrounding businesses.
   b. An increase in rents for rental units and commercial.
   c. More buying power for the new mall and other proposed developments nearby.
   d. Demographic potential for high-end stores and establishments to open in downtown Long Beach.

3. High quality of downtown living, similar to the early 1920's European flair and elegance.

4. Pride in homeownership, having high-end developments, as neighbors.

Our city deserves the best of everything, like other Southern California cities. Mr. Gordon Ip, Genesis Real Estate Group, the 350 E Ocean developer, made a commitment to bring beauty, history and elegance with this project- past, present and future. The Planning Commission and the City Council have done their jobs very well with all the work necessary to have 350 E Ocean and other new developments invest in our city. I realize, that, for some people, new developments and buildings means "bad news". This is not so. There are always talk of projects and developments not working in our city, (or did not work) for one reason or another. Consider the possibility, that, if, each and every Long Beach resident promotes and supports these projects in our city, such as the Aquarium, Pine Avenue shops and restaurants, downtown businesses, and others, these entities will thrive and grow. It will provide prosperity and abundance to our city and our people.

I thank each and every one of you for working very hard to keep the pride in our city. Thank you for your commitment and stand for a beautiful Long Beach. We are heading in the direction where we should be- thinking outside of the box. It is an honor and a privilege to live in a beach city that offers the same things other beach cities have, and still, have the sense of community and family all in one. Long Beach is truly an "International City".

I strongly encourage the City Council to support this project. This project can be the catalyst for greater things to come to our city. It would give me pride when I can look out from my window of the Historic Cooper Arms, and not see a "cookie cutter" that has replaced my Queen Mary and ocean view- the Ocean Villas.

Thank you for listening. Thank you for allowing me to participate in creating greatness to our beautiful city.

Sincerely,

Marie Baconawa, Chair
Cooper Arms National Register
Homeowner and Board Member 2001

CALIFORNIA COASTAL COMMISSION
SOUTH COAST AREA
P.O. BOX 1450
200 OCEANGATE, 10TH FLOOR
LONG BEACH CA 90802-4418

AGENDA ITEM: M 12 A
APPLICATION A5-LOB-01-111
GEORGE LANE CAMPBELL
OPPOSED

RECEIVED
South Coast Region
MAY 2 2001
CALIFORNIA
COASTAL COMMISSION

Esteemed members of the Coastal Commission:

I object to the Genesis Real Estate Group project at 350 E. Ocean Boulevard since the project is located at the address of two blocks of an ocean-view park called Victory Park, but would destroy most of the ocean view up to a level of 18 stories both to pedestrians on the Ocean Boulevard level and to clients of the 16-story Westin Hotel, businesses and residents at multi-story buildings 401 E. Ocean and 425 E. Ocean, and partly destroy the view of the residents of 12-story 455 E. Ocean. This would be contrary to Proposition 20, the Coastal Act, which provides for viewscapes of the sea. This area is one of only three small areas left of the "Victory Park" area which has become alienated from its original ocean-viewing purpose by construction over many decades, and this is the only one to really have an ocean view left.

Downtown Long Beach is heavily oriented towards tourism, both historically and presently, related to the coastal area, and tourist traffic is heavy between the downtown hotels and motels towards the Convention Center. As was previously stated, view of the harbor area and Queen Mary would be largely ruined for this type of visitor as well as for the inhabitants of this large city. Effectively, as the address of the project demonstrates, the ocean-view park for these two blocks would become a semi-private front yard for the two 18-story towers as in other sectors of the "park".

The offer of putting in a walkway behind the structures along Seaside Way, in what would be in reality the back yard of the complex, would not encourage most people to take the opportunity of strolling through this area as if it were really a public area. Psychologically, it would put a strong damper on the natural tendency of Ocean Boulevard strollers to observe and enjoy the view of the ocean and harbor.

The Long Beach Planning Commission submitted a Negative Declaration instead of an Environmental Impact Report, in spite of serious consequences which they labelled "insignificant" or "almost insignicant", such as the total destruction of the park environment by excavation in which the flora and fauna would be totally removed for who knows how long and later "replaced" by other species. The numerous ground squirrels or gophers would not likely be replaced after a "vacation" elsewhere so as not to menace the new front-yard gardens that would replace the park area. They also deemed "insignificant" the daily multi exits and ingresses from and to more than 1,000 parking spaces in a small two-block area which would impact traffic and air quality, and probably foot access to the Convention Center and shoreline area for the many tourists and locals. This lack of an EIR was gravely irresponsible, if not illegal.

I respectfully request the Coastal Commission to deny the petition.

GEORGE L. CAMPBELL
George L Campbell
455 E. Ocean Bl #701, Long Beach CA 90802-4941
(562) 436-4421
May 1, 2001

COASTAL COMMISSION
A5-LOB-01-111

EXHIBIT # 13
PAGE 1 OF 1

California Coastal Commission
South Coast District
Attn. Chuck Posner
200 Oceangate 10th Floor
Long Beach, CA 90801

6/15/2001

Commission Appeal No. A-5-LOB-01-111
Local permit #0012-20

Dear Chuck,

This is all of the information that I have been able to gather regarding the proposed building at 350 E Ocean Blvd. Long Beach.

I have looked at the LCP for this section of Ocean Blvd., as well as the Guidelines for Victory Park and the Original Trust Deed granting the park to the City of Long Beach. I have outlined the sections that are at odds with each of the above-mentioned documents.

I would hope that you would be able to include this in the documentation package for each of the Commissioners.

I know in the past the members of the board have taken field trips to visit various sites and I would hope that they can visit Victory Park to see for themselves what will be lost if the developer is allowed to rebuild the park as he has proposed!

If I can be of any further assistance please do not hesitate to call on me.

James Mewes
425 E Ocean Blvd. #310
Long Beach, CA 90802
562-590-1430

Sincerely,

James W. Mewes

ENCL.

LCP for Victory Park and original Trust Deed

1. A "Strip Park" shall be dedicated and maintained from Alamitos Avenue to the Los Angeles River on the south side of Ocean Boulevard. The width of such park shall be no less than as set forth in the Deed of the Long Beach Land and Water Company to the City of Long Beach dated May 13,1889 and recorded in Book No. 572, Page 144 of the records of the Los Angeles County Recorder.

The above statement is directly form the Local Coastal Program. It defines Victory Park and the boundaries that must be maintained. The Building and Planning Department, RDA do not know the boundaries of Victory Park. The Parks and Recreation Department have not responded to my request for information. It would be beneficial to determine the exact location and size of this city park based on the original Deed of Trust.

The original Deed also states " Upon the condition that the above described property and the whole thereof be used exclusively for the benefit of the inhabitants of said city, and of all the public as and for a public park for the health and recreation and pleasure of the inhabitants of said town and of the public and **upon the further condition that no building or structures of any kind be erected upon said premises which would obstruct the view of the Pacific Ocean from the lots north of and immediately opposite the property above described."**
The original Trust Deed was granted to give the City the right to build a public roadway. This Deed of Trust has been violated in many areas along Ocean Blvd., before we violate it again lets step back and consider what this project is about to do to that trust.

2.The LCP set out the basic parameters for Ocean Boulevard Parks.

The public park areas along the south side of Ocean Boulevard should be redesigned and renovated as a beautiful urban park to provide:

1. A greenbelt and open space.
2. Places for visitors, passerby and office workers to relax.
3. Ocean view area.
4. Visual and psychological relief adjoining urban activities.

It further states: "All new developments between Ocean Boulevard and Seaside Way shall landscape the Ocean Boulevard park strip adjoining the site and the setback between the property line and the building in a landscape theme, and landscape materials designated in the City landscape plan for this park. The basis for this plan shall be the landscape policies for the area adopted in the Local Coastal Plan."

3."The public park land should be legally dedicated for public park purposes exclusively. The boundaries of this park area shall be no less than as set forth in the Deed of the Long Beach Land and Water Company to the City of Long Beach dated May 13, 1889 and recorded in Book 572, Page 144 of the records of the Los Angeles County Recorder."

Victory Park was formally declared and dedicated for public park purposes in 1980.

The Long Beach City Planning Commission formally adopted a set of guidelines on October 26, 1989

"Victory Park was formally declared and dedicated for public park purposes in 1980. The purposes of these guidelines is to insure that land is available for the enjoyment of the citizens and general public of Long Beach."
The Victory Park Guidelines, adopted October 26, 1989 by the Long Beach City Planning Commission states the following:

PRINCIPAL USE
"The principal use of the park surface is passive and visual public open spaces."
"The following uses and elements are prohibited
All private and commercial uses.
All new driveways, ramps, parking at or above grade, porte cochere, bicycle paths, retaining and freestanding walls or architectural elements not listed as permitted.

DESIGN CHARACTER
The design shall be developed as an informal landscaped public park.

PLANTING
"Primary trees shall consist of Coral trees (Erythrina caffera) and Eucalyptus, siderolyxon, minimum size 60" box. A minimum of one tree shall be provided for each 35' linear feet of property line. Trees shall be **informally planted in the southern 25% of the park per block.**
Secondary tree shall be provided at the rate of one tree per 30' linear frontage informally spaced and shall be of 48" box size. Secondary tree shall consist of one or more of the following: Albizia Julibrissin, Melaleuca leucadendra or Mclevey nesophilla. Metrosideros tomentosa. Ficus Rublginosa, Pinus hallpensis and Prunus sp. (flowering peach is strongly encouraged).

See attached exhibit for other requirements and restrictions. Victory Park Design Guidelines. Dated October 26, 1989.

The LCP (Page III-DS 37) states the following "Landscape planters on top of parking structures may exceed Ocean Boulevard sidewalk grade by three feet, provided such planters are not located in view corridors or in the public park strip."

Recommendations

1. Establish the exact boundaries for Victory Park
2. Redesign Victory Park to meet the criteria set forth in the LCP and the Victory Park Guidelines
    a. Use planting materials that would keep the appearance of a park
    b. Remove the potted palms as they are not allowed under the LCP and are not on the list of approved trees in the Victory Park Design Guidelines.
3. Delete the entry drive from the development plan.
4. Develop a park plan that will retain the current elements of the existing park.
5. Or leave the park as originally designed and deeded in the Trust Deed from the Long Beach Land and Water Company.

PLANTING

- A double row of palm trees (Washingtonia robusta) spaced 30' on center shall be planted on either side of the Ocean Boulevard sidewalk. Palms shall be 20' in height when installed.
- The northern 75% of the park depth shall be planted in lawn. Sod is mandatory and shall consist of Hybrid Bermuda Hybrid "Marathon".
- The southern 25% of the park shall be planted and coordinated with groundcover and seasonal color beds, shrubs and trees as follows:

Groundcover perennials and seasonal color beds:

The purpose of these beds is to provide a lush, changing display of seasonal color. Although planting is to be informal, major emphasis shall be placed on coordinated mass.

Shall be evergreen and may consist of Star Jasmine (Trachelospermum jasminoides), Lily-of-the-Nile (Agapanthus africanus), Bird of Paradise (Strelitzia), Saxifragra, (Sacifrogra umbrosa) as well as seasonal annual color.

The minimum size for groundcover shall be flats planted a maximum of 12" on center. Perennials shall be a minimum of 1 gallon size, planted a maximum of 18" on center. Seasonal color shall be a minimum of "quarts" and planted a maximum of 12" on center.

Shrub Beds:

It is intended that the shrub beds serve as the backdrop for the groundcover and seasonal color.

Low growing shrubs are encouraged, provided there is to be strong coordination with the groundcover and seasonal color. The minimum size for shrubs is 5 gallon, maximum spacing is 3', on center shrubs shall be grouped and planted informally.

The following species are permitted: Azalea sp. Mirror Plant (Coprosma repens), Indian Hawthorn (Raphiolepis indica), Gardenia (Gardenia sp.) Hibiscus (Hibiscus sp.)

Trees:

Trees will serve as a backdrop to the park. Primary trees shall be utilized to define the end of the park space. Secondary trees shall be utilized to accentuate and to provide interest. All trees shall be informally spaced. Groupings are preferred over individual plantings.

Primary trees shall consist of Coral trees (Erythrina caffera) and Eucalyptus, sideroiyxon, minimum size 60" box. A minimum of one tree shall be provided for each 35' linear feet of property line. Trees shall be informally planted in the southern 25% of the park per block.

Secondary trees shall be provided at the rate of one tree per 30' of linear frontage, informally spaced and shall be of 48" box size. Secondary trees shall consist of one or more of the following: Albizia julibrissin, Melaleuca leucadendra or Melevey nesophilia. Metrosideros tomentosa, Ficus Rubiginosa, Pinus halipensis and Prunus sp. (flowering peach is strongly encouraged).

DECORATIVE LIGHTING

Uplighting on palm trees: Each of the palms in the double row of trees at the Ocean Boulevard sidewalk shall be uplighted. Single upright floodlights shall be strapped to the trunk 10 feet above grade to the specification of the Director of Public Works.

Floodlighting of shrubs: Shrubs groundcover, and seasonal color shall be lighted. All light sources shall be concealed.

REQUIRED PLANS

Prior to approval of site plan review, the applicant shall submit three sets of the following working drawings to the Director of Planning and Building:

- grading and drainage plans, which shall include the location of all architectural elements. Plans shall indicate by spot elevation, contours and drainage lines of the topography.
- complete planting plans, specify species, size and location.
- night illumination plans, specify the location and type of fixtures.
- complete irrigation plans.

MAINTENANCE

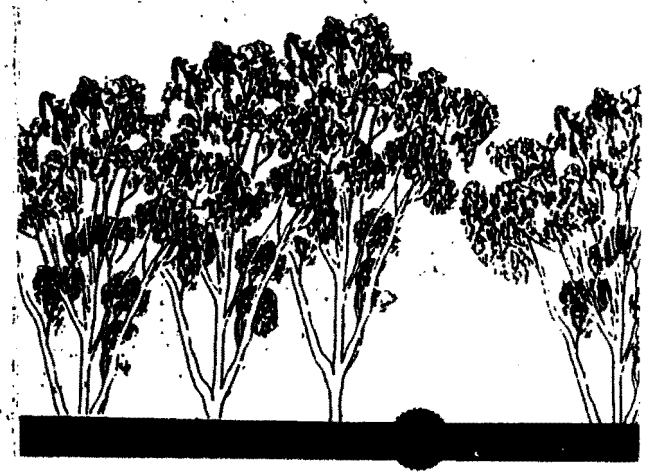
The landscaping shall be maintained to the standards as established by Public Works Department by the adjacent property owners.

These guidelines have been prepared in cooperation with the following Long Beach Departments:

City Manager's Office
Community Development
Parks and Recreation
Police
Public Works

VICTORY PARK DESIGN GUIDELINES

ADOPTED OCTOBER 26, 1989
LONG BEACH CITY PLANNING COMMISSION
CITY OF LONG BEACH



VICTORY PARK DESIGN GUIDELINES

October 26, 1989

Victory Park was deeded to the City in 1889. Since that time the area has historically served as the front yard to the Long Beach Central Business District. Today, the area functions as the major passive linear park in the Greater Downtown.

PURPOSE

Victory Park was formally declared and dedicated for public park purposes in 1980. The purpose of these guidelines is to insure that the land is available for the enjoyment of the citizens and general public of Long Beach. At the same time, the guidelines serve to coordinate the design and renovation of the park to cause a design that is reminiscent of historic Long Beach and reinforces the character of Ocean Boulevard as a grand boulevard.

APPLICABILITY

These guidelines apply to all portions of Victory Park from Alamitos to Golden Avenue and shall govern for both new construction and renovation.

PRINCIPAL USE

The principal use of the park surface is passive and visual public open space.

The following uses and elements are prohibited:

- All private and commercial uses.
- All new driveways, ramps, parking at or above grade, porte cochere, bicycle paths, retaining and freestanding walls or architectural elements not listed as permitted.
- Directional, private and commercial signs.

Between Pacific Avenue and Long Beach Boulevard, mobile commercial venders and public information kiosks may be permitted, as determined appropriate by the City Planning Commission.

DESIGN CHARACTER

The design shall be developed as an informal landscaped public park.

TOPOGRAPHY

Grading and Drainage:

The northern 75% of the park width shall be graded to appear to be level with the top of curb and sidewalk. The maximum grade permitted is 3.0% starting from the top of curb at Ocean Boulevard and extending to the southern 75% of the park. Drainage shall be accomplished by area drains.

Low berms are permitted in the southern 25% of the park, provided the area is planted with groundcover, shrubs and/or seasonal color. Berms shall not be located in or interfere with required view corridors. Berms shall be informally shaped, with a maximum slope of 2:1 and shall not exceed five feet in height above the top of the Ocean Boulevard curb.

ARCHITECTURAL ELEMENTS

Fountains and Sculptures

- Appropriately designed fountains, and sculptures are permitted in the southern 25% of park (only). It is intended that these features accentuate the park and public usage, while at the same time protect the continuity of the lawn. These features shall not be utilized to accent an entrance to the adjacent development.

Walkway

- One pedestrian walkway is permitted to connect the Ocean Boulevard sidewalk to each development south of the park. The intent is that the walkway be unobtrusive and does not "read" as a major entrance to the adjacent development, nor should the walk serve as a major design element in the park. The walk shall be no greater than 8' in width and shall be surfaced with dark brown iron stone pavers, running bond pattern parallel to the walk length. Pavers shall be as specified by the Public Works Department. One half inch mortar joints shall be provided. The walk shall be flush with the lawn.
- Entrances to the promenade and treatment of required view corridors shall be as specified in the Local Coastal Plan and subject to Site Plan Review.

Mowing Strip

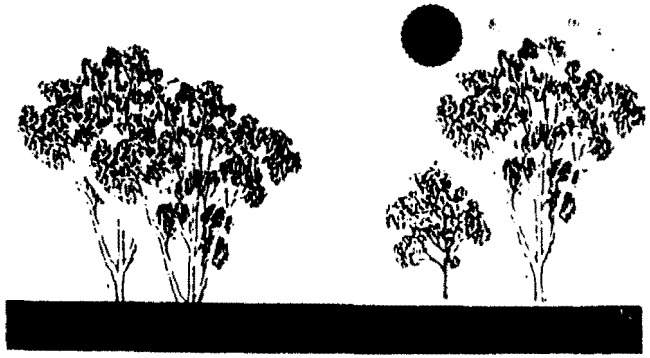
- A 6" wide concrete mowing strip shall be installed to separate lawn areas from groundcover and shrub beds. The strip shall be of natural color and shall be flush with lawn grade.

Seating

- One bench shall be installed for each 60' of frontage. Benches shall be informally spaced and placed directly adjacent to the mowing strip. Benches shall be placed on a natural color concrete pad which shall be the scale dimension as the bench. The concrete pad shall be flush with the lawn. Benches shall be as manufactured by Victor Stanley or approved equal as follows:

  Model UB 318-4

  Specifications—Bench shall have eighteen (18) wood slats in a reverse contour design, six (6) foot in length. Wood shall be "IPE", 2" × 3" slats with leading edges of the top and bottom slat having large radius finish detail. Leg and center-brace contour bars shall be solid ⅜" thick × 3" wide steel bars. Legs shall be in-ground mount—high-tensile strength 2" square tabular steel welded directly to formed contour bar. All steel shall have "Publicote", powder-coated finish. Bench frame shall include "Unislat" bracket design complete with applicable hardware.



- Sculptural benches may be substituted for that specified, providing that the bench is executed or designed by a recognized artist and the bench is found to be appropriate to the parking design.

Trash Receptacles

- One trash receptacle shall be provided for each 150 linear feet of Ocean Boulevard frontage. Receptacles shall be placed adjacent to the Ocean Boulevard sidewalk upon a concrete pad the size of the container. Receptacles shall be as manufactured by Victor Stanley or approved equal as follows:

  Model HF-24

  Specifications—Waste container to be 24 gallon capacity. There shall be 24 - 2" × 3" wood slats attached to "Publicote", powder-coated, treated, welded steel frame. Wood shall be "IPE". Each frame to consist of three (3) steel rings (⅛" × 1" flat steel), welded to eight (8) vertical rods, with eight rods across the base. Lid shall be fiberglass attached by stainless steel aircraft cable. A high density plastic liner shall be provided.

Drinking Fountain

- One drinking fountain shall be [illegible]ided for each block face. Drinking fountains s[illegible]e adjacent to the Ocean Boulevard sidewalk. Drinking fountains shall be as manufactured by Haws, model number B176 concrete aggregate, with number 6610 sand trap or approved equal.
- Sculptural drinking fountains may be substituted for that specified providing that it is executed or designed by a recognized artist and is found to be appropriate to the park design.

Signage

- A sign shall be placed at the intersection of each north/south street and shall contain the following information:

  Victory Park
  Established in 1889
  City of Long Beach

  Such signs shall either be in the form of a bronze plaque, flush in the Ocean Boulevard sidewalk or as a monument sign not to exceed two feet in height (from grade) by five feet in length. Such signs shall be in concrete lettering size and styles shall be as specified by the Public Works Department.

RESIDENTIAL PARKING DEMAND STUDY
SOUTHERN CALIFORNIA COASTAL ZONE

JUNE, 2001

PREPARED FOR

CALIFORNIA COASTAL COMMISSION

PREPARED BY

KAKU ASSOCIATES
A Corporation

EXECUTIVE SUMMARY

The Genesis Real Estate Group is proposing to build a residential development at 350 East Ocean Boulevard in downtown Long Beach, California. The project proposes to serve this development with 1,008 parking spaces – a ratio of 1.81 spaces per dwelling unit.

The City of Long Beach's Local Coastal Plan LCP) calls for a parking ratio requirement of 2.16 spaces per dwelling unit. The LCP parking standard was adopted almost 20 years ago – prior to the introduction of significant job growth and transit improvements in downtown.

The City granted a parking variance and approved the project in March 2001. The California Coastal Commission has asked for additional backup regarding the parking demand patterns in dense residential developments.

Detailed parking counts were conducted at midnight on a weekday (the peak parking time of the day) at 11 apartment and condominium complexes in the Coastal Zone. The sites were located in San Diego (3 sites), Long Beach (4), Marina del Rey (2) and Santa Monica (2). The peak parking demand at these 11 sites ranged from 0.66 to 1.59 spaces per occupied dwelling unit (sp/du).

Figure 1 compares the parking supply and peak parking demand at the 11 study sites to the proposed parking supply at the proposed 350 East Ocean project. As can be seen, the 1.81 sp/du parking supply at the project would be more than sufficient to meet the parking demand at any of the 11 test sites.

Seven additional high-density apartment complexes in San Diego were the subject of detailed parking occupancy surveys by Darnell & Associates in 1996. These surveys showed peak parking demands of 1.15 to 1.52 sp/du. Again, the parking supply proposed for the 350 East Ocean project would be more than sufficient to meet the demand at any of these sites.

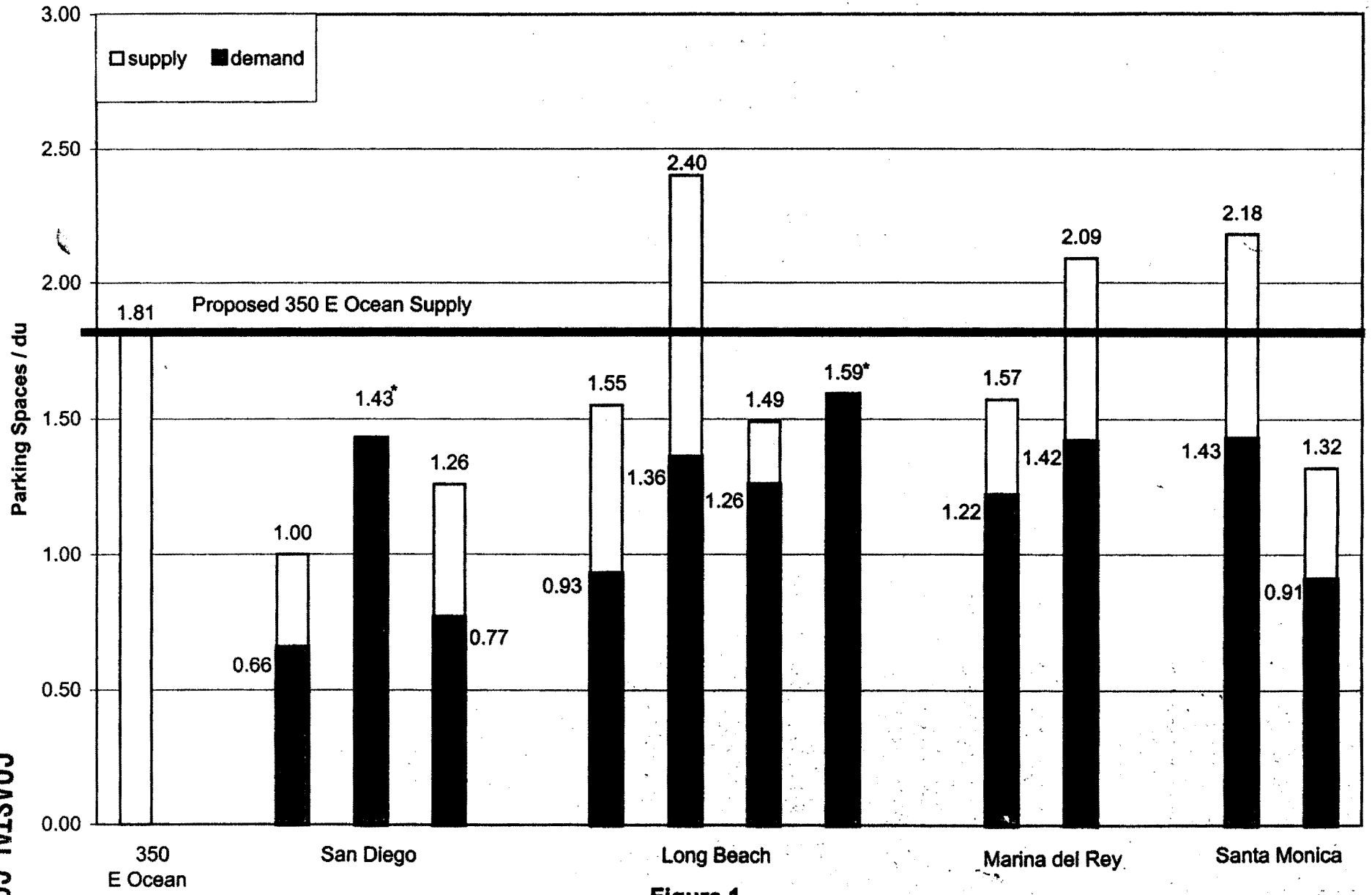


Figure 1
Parking Supply and Demand Survey

See discussion in text.

The projects that had the highest proportion of small units (i.e., studio or one-bedroom units) had the lowest parking demands among the sites studied. With 64% of its units configured as one-bedroom apartments, the proposed 350 East Ocean project would be expected to experience parking demand rates in the lower end of the 0.66 to 1.59 range measured in the 18 study sites.

The parking requirement for the Long Beach Local Coastal Plan was adopted over 20 years ago. Since the adoption of the required 2.16 sp/du standard, downtown Long Beach has added transit service (Metro Blue Line light rail transit, free Passport shuttle service and the Downtown Transit Mall) and thousands of downtown jobs. In the 20 years since the adoption of the LCP parking standard, the trends toward later marriages, fewer children and increased preference for living without roommates all combine to reduce on-site population density. In fact, 26% of all households in the United States are now single-person households – the highest proportion in the history of the country.[1] These factors result in reduced on-site parking demand, as seen in all 18 sites surveyed.

Detailed parking surveys at 18 high-density residential sites in Southern California showed peak parking demand patterns significantly less than the supplies required by the Local Coastal Plan. The proposed project at 350 East Ocean in downtown Long Beach would provide a parking supply of 1.81 spaces per dwelling unit. This parking supply would more than adequately serve the parking demand found at any of the 18 sites studied. No spillover parking onto the adjacent streets would be expected.

The results of this study show that the proposed parking supply at the 350 East Ocean residential project would provide more than enough parking to meet its peak parking demand. Adding more parking to the proposed supply would not increase the parking supply available to the general public visiting the California coastal resources because additional spaces would be private, reserved (but empty) spaces allocated to the residential apartments in the development.

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[1] The Old Neighborhood: What We Lost in the Great Suburban Migration: 1966-1999, Ray Suarez, Senior Correspondent, The NewsHour with Jim Lehrer, 2000

Exhib

A5-LoB-