#### **CALIFORNIA COASTAL COMMISSION**

South Coast District Office 301 E Ocean Blvd., Suite 300 Long Beach, CA 90802-4302 (562) 590-5071



# Th11a

City of Long Beach
October 8, 2020

**CORRESPONDENCE** 



October 2, 2020

Steve Padilla, Chairperson California Coastal Commission 455 Market Street, Suite 300 San Francisco, CA 94105

Item Th11a

Re: City of Long Beach LCPA No. 1-19, LCP-5-LOB-19-0008-1 (SEASP)

Dear Chair Padilla and Honorable Commissioners,

The City of Long Beach is delighted to present our Southeast Area Specific Plan (SEASP) for certification by the Coastal Commission. This plan represents more than ten years of community planning, collaboration, compromise and hard work. This plan will provide permanent protections for wetlands alongside a fund for wetland restoration and monitoring. At the same time, this plan will create a pathway for more than 2,500 needed multifamily housing units, all through redevelopment of existing shopping center parcels. This plan is important to accomplish shared natural resource protection, housing and planning goals for the City, the Coastal Commission, as well as the region and state at large. We include for your consideration a summary of SEASP's benefits (Attachment A).

While the City is generally supportive of the staff recommendation, we do respectfully disagree and object to a few of your staff's suggested modifications, including **Suggested Modification #8.** Specifically, the Coastal Commission staff has inserted the date of January 1, 1977 into an entirely new definition of "redevelopment." The City requests that the language regarding this definition is further clarified to note that the applicability of this definition is only related to shoreline protective devices and coastal hazards. If this definition is necessary at all, the language should include reference to the City's demolish and rebuild definitions to provide for consistency with the Nonconformities Section (Section 21.27) of the Municipal Code.

The use of the January 1, 1977 date outside of the context of these definitions is arbitrary and may result in legal challenges by property owners. The Coastal Act does not include any statutory definition for existing development as meaning only that which existed prior to January 1, 1977. Furthermore, the proposed amendment would have the retroactive effect of voiding conforming rights enjoyed by property owners who obtained coastal development permits and built to those specifications, be that in 1980 or later. As the Commission has gone through no rulemaking process regarding the imposition of January 1, 1977 and the issues posed by its insertion, we respectfully request that the date of certification of SEASP be used in this definition.

The January 1, 1977 start date would unfairly treat similarly situated property owners differently. The City and Coastal Commission's past record keeping documentation did not track the percentage of changes of structural components. Therefore, property owners with better (and likely more recent) documentation would be treated substantially different than those without substantial evidence of past structural modifications. The implementation of this metric of cumulative and retroactive tracking will result in the inconsistent and incomplete application of the regulation.



In addition, the SEASP project area includes properties <u>outside</u> of the City's Coastal Zone boundary. The amendments should clearly indicate which policies apply to the coastal zone. The imposition of the January 1, 1977 date for "existing" conditions, in effect, represents a retroactive change to the development rules and could deem a large number of non-Coastal properties as nonconforming, whereas those properties are not subject to the provisions of the Coastal Act.

The challenge remains that similarly situated properties, legally developed under the same tract map/entitlement or at the same general timeframe/conditions, will be held to differing definitions of "existing" conditions than currently applied. The application of a non-codified term of "redevelopment" in conjunction with the January 1, 1977 date to the SEASP area (both Coastal and non-Coastal areas) would further complicate concerns related to regulatory consistency across the City. The constraints and complications for this new definition and start date could substantially affect the use of property outside of the Coastal Zone, which is not within the Coastal Commission's purview. The later and eventual application of this policy to other areas of Long Beach through your staff's suggested modifications to future LCP amendments would have unintended challenges that would affect a majority of development throughout the entire City.

This same issue appears in **Suggested Modification #12** wherein shoreline protection devices are limited except for structures that existed prior to January 1, 1977. Within SEASP, it is primarily public improvements and infrastructure that are protected and would continue to be allowed such protection. However, the City is concerned that both Suggested Modification #8 and #12, should they later be applied in other areas of Long Beach, would have significant consequences that would be far more impactful to property owners in other geographic segments of the City. These consequences include takings litigation related to maintenance of legally permitted structures, as well as the impact of maintaining or enhancing protective structures that protect both public and private property and any failure of those systems having impacts on public access to the Coastal Zone. We believe discussions regarding these issues, held with staff on October 1, 2020, were positive and look forward to our concerns being addressed in an addendum that will clarify the intent and applicability of these provisions of Suggested Modifications #8 and #12.

The City objects to language within **Suggested Modification #9** which ambiguously encourages replacement of legally demolished hotel rooms as soon as possible. While the City shares the Commission's goal of promoting access to the coast, including through the provision of overnight visitor-serving accommodations, the City quite simply lacks the ability to force the replacement of motel rooms that were legally demolished prior to the Commission beginning its certification review of SEASP. The position the City is being placed in is to require Property Owner A to rebuild motel units that were legally demolished by Property Owner B on a completely different parcel. This approach is beyond the City's or the Commission's purview and abilities. We appreciate the refinements to the language made by staff; however, the remaining reference to "encouraged to be replaced" and "as soon as possible," will inevitably lead to future confusion and dispute. The correct approach here is to provide more general promotion of overnight visitor-serving accommodations as is already present in the plan and its development standards. The City proposes the following policy revisions:

6. The 150 lower cost rooms that were demolished at the SeaPort Marina Hotel are encouraged to be replaced with lower cost overnight accommodations at a one to one ratio as soon as possible. The City may consider other inherently low-cost accommodations for this replacement, in lieu of hotel rooms, such as camp grounds, hostels, etc. Replacement lower cost overnight accommodations must be protected in perpetuity. This policy is not intended to preclude the development of new overnight accommodations by obligating future project applicants to provide the replacement rooms within their development.



Lastly, we object to the usefulness of the imposition of the policy in **Suggested Modification #9** that requires either 1) the provision of 25% of new rooms as lower cost accommodations or 2) the payment of an in-lieu fee of \$100,000 per room plus land costs. The City of Long Beach agrees with the goal to promote lower-cost visitor accommodations, which the plan does through land-use policies encouraging hotel development as well as motels, hostels, camping and overnight stays on marine vessels. The amount of the in-lieu fees however is so high that it would render all new hotel development as infeasible. We know this is not Commission staff's intention; however, the members of the Commission should carefully consider the result and consequences within the unique economic framework of the City of Long Beach. As such, we ask that you strike this portion of Suggested Modification #9 in order to truly encourage the creation of new overnight accommodations.

We thank the Commission for their consideration of our concerns. The City is also very appreciative of the staff work completed by City and Commission staff on this Local Coastal Program Amendment (LCPA) request. It has been a multiyear effort, and everyone has worked together toward our shared goals. Our collective staffs have worked collaboratively through difficult issues such as permitted land uses, ESHA and wetlands protection, housing balance, sea level rise and more. The City wants to continue working in good faith toward the consistent and uniform implementation of the policies crafted through this extensive planning effort with the overall goal of advancing and enforcing the intent of the Coastal Act. We hope this level of cooperation will continue through the implementation of SEASP and future projects.

In approving SEASP, the Commission has an opportunity to certify a plan of statewide importance, from its treatments of wetlands and habitat to its aggressive and important steps to address the statewide housing crisis. We are proud of the plan in front of the Commission and look forward to your consideration.

Sincerely,

Christopher Koontz, AICP

**Deputy Director** 

Attachment: A - Southeast Area Specific Plan (SEASP) Summary Sheet

cc: Jack Ainsworth, Executive Director Steve Hudson, District Director Amber Dobson, District Manager Zach Rehm, Senior Planner Dani Ziff, Coastal Program Analyst







#### **SEASP Vision Statement**

Southeast Long
Beach is a
livable, thriving,
ecologically
diverse, and
sustainable
coastal gateway
and destination
in the City
and Southern
California region

#### A Sustainable Plan

The provisions of the SEASP balance the three primary "pillars" of sustainability and ensured they were equally considered to create a sustainable,

Physical Benefits

Environmental Benefits Economic Benefits

Amenities, design & placemaking Conservation of coastal resources

Development feasibility in current market conditions

## CITY OF LONGBEACH

#### What is SEASP?

The Southeast Area Spec c Plan (SEASP) provides a collective community vision and strategy for Southeast Long Beach. It establishes customized land uses and design policies and standards, locations for compact development, expands multi-modal transportation choices, promotes a healthy lifestyle through an increase in walking and bike paths, and maintains valuable coastal and wetland resources.

#### The certification of SEASP is important for the community because it:

- Provides new protections and incentives to coastal resources and visitor-serving accommodations in the area, including The creation of a new Coastal Habitat Wetlands and Recreation designation that designates 117 acres of land for coastal and visitor-serving resources that could have otherwise been developed under the 1977 plan and increases amount of coastal habitat areas that can be available for permanent dedication over time
- Includes protections in terms of limited lighting, leading-edge bird-safe treatments, buffers, native and non-invasive plant landscaping, and other sustainability features and provisions to restore and enhance water to wetlands views and shoreline, water, and wetlands access
- Establishes ways to fund new community amenities and opportunities to restore wetland viability
- Represents more than ten years of community planning, engagement and solution-generating discussions. Over 30 targeted meetings and events were held, including pop-ups at local venues, Community Advisory Committee Meetings, Community Meetings, and one on one Stakeholder Meetings
- Encourages the removal of old wells in existing wetland areas and consolidation of new oil operations into a smaller, more concentrated area to support restoration activities
- Focuses on Redevelopment: Future growth and new commercial uses are limited to the redevelopment of existing shopping centers without developing any new or undisturbed areas and decrease the total commercial square footage allowed in SEASP. Land use changes are proposed in less than 20% of the 1,500 acres located in the specific plan
- Provides 2,584 housing units, 9.8% of the needed 26,400 in Long Beach as mandated in the 6th Cycle Regional Housing Needs Assessment. Since Southeast Long Beach is a highresource and advantaged community, bringing multifamily to the area addresses housing equity and meets state housing mandates (the City cannot meet its mandated housing obligations without this change to land use)
- Provides new waterfront shopping and dining options for Long Beach residents and visitors and brings multifamily housing closer to employment (which reduces local and regional vehicle miles traveled)
- Provides for a 79% expansion of bicycle routes, 29% expansion of sidewalks and pedestrian paths, and a 9% increase in local roadways to improve mobility. The majority of the plan's mobility improvements are proposed within existing rights-of-way, eliminating the need for street widening adjacent to wetland and sensitive habitat areas
- Ensures development feasibility in current market conditions through tested development standards, including height allowances, parking requirements, and incentives for preferred and coastal-oriented uses



#### **Priorities of SEASP**

Through an extensive outreach process, a list of priorities was compiled to develop the vision statement and guiding principles

The project priorities are listed below in order of importance to the community.

- **1. T** Improve vehicular and balance new development with roadway capacity.
- **2. Wetlands Enhancement.** Improve accessibility and pursue opportunities to restore wetland viability.
- **3. View Preservation.** Preserve views of the hills and mountains and maintain the scenic environment through control of building placement and/or height.
- 4. Bike and Pedestrian Transportation Options. Improve pedestrian and bicycle connectivity by creating an active streetscape that promotes safe walking and cycling.
- 5. Gateway to Long Beach. Use signage, landscaping, or the design of new development to clearly delineate the entrances to Long Beach and the SEASP area from Orange County and/or State Route 22.

- **6. Public Access to Open Space.** Improve public access to the marina, waterways, wetlands, and parks.
- 7. **Building Form/Architectural Design.** Develop guidelines to guide the character and quality of development while creating a sense of place in southeast Long Beach.
- **8.** Consolidate or Relocate Oil Operations. Consolidate or relocate oil operations where possible to facilitate wetlands restoration and minimize visual impacts.
- **9. Retail and Hotel Development.** Encourage new shopping, dining and hospitality options to the area.
- **10. Greater Mix of Land Uses.** Create a land plan that encourages a greater mix of uses and appeals to a diverse population.

## A Community-Driven Planning Process

The vision statement, priorities and guiding principles were crafted for SEASP with extensive community input and adopted by the Long Beach City Council on September 19, 2017. They have been excerpted from the Plan document for ease of reference.

## **SEASP Guiding Principles**

- 1. Implement projects within the Specific Plan area that give equal consideration to planning, environmental and economic feasibility.
- 2. Balance responsible growth with resource preservation through a flexible land use plan that provides a greater mix of uses and through an implementation strategy that is tailored to the local economy.
- 3. Provide clear standards and guidelines to encourage future development that respects the wetlands, protects views, and creates a sense of place through thoughtful building placement, form, and architectural design.
- 4. Expand multimodal transportation options through enhanced pedestrian and bicycle connectivity without compromising vehicular traffic flow.
- 5. Provide options to increase public connectivity to open space, including the marina, other waterways, the wetlands, and parks.
- 6. Identify and plan for enhanced gateway and landmark locations that define the entrance to the City and contribute to a sense of place for the area.

#### Antonella Schaub <antonellaschaub@hotmail.com>

Tue 9/29/2020 7:41 PM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

Hello Dani,

I would like to ask for your support of the City of Long Beach's SEASP planning document. This updated development plan will enhance coastal view corridors along Pacific Coast Highway, provide much-needed wetlands restoration, add new waterfront experiences, create additional bike and walking paths, and allow the business community an opportunity to re-image our commercial shopping centers. Additionally, when projects are implemented within this new development plan, equal consideration will be given to planning, environmental, and economical implications. This project seeks to create a holistic development plan instead of piecemeal projects which have detrimental impacts to the restoration efforts of the Los Cerritos Wetlands and our community. Finally, I believe that an updated SEASP plan will elevate the overall quality of life in South East Long Beach. I thank you for your support of this particularly important project.

Sincerely, Antonella Schaub

#### SEAP, CCC Item TH IIa

#### Jennifer ODay <jenniferodaymd@gmail.com>

Tue 9/29/2020 8:00 PM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

I would like to express my support for SEASP. As a parent of young children, I support the creation of new coastal habitat wetlands and recreation, which will set aside 117 acres of land for coastal and visitor-serving resources for me and my children to enjoy. Without an update to SEASP the wetlands have the potential to be developed. I also like that the plan encourages the removal of old oil wells on existing wetlands parcels and consolidates oil operations onto a smaller parcel. I hope you will support this collective community vision for Southeast Long Beach. It has been a long and passionate debate over the last decade and at the conclusion of the planning process we have a well-balanced document that supports conservation of our coastal resources and responsible growth. Thank you for your time.

Sincerely, Jennifer O'Day

#### Josi Smith <josi.smith@mac.com>

Tue 9/29/2020 9:48 PM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

I would like to express my support for SEASP. As a parent of young children, I support the creation of new coastal habitat wetlands and recreation, which will set aside 117 acres of land for coastal and visitor-serving resources for me and my children to enjoy. Without an update to SEASP the wetlands have the potential to be developed. I also like that the plan encourages the removal of old oil wells on existing wetlands parcels and consolidates oil operations onto a smaller parcel. I hope you will support this collective community vision for Southeast Long Beach. It has been a long and passionate debate over the last decade and at the conclusion of the planning process we have a well-balanced document that supports conservation of our coastal resources and responsible growth. Thank you for your time.

Sincerely, Josi Smith

Josi Smith Sent from my iPhone

#### Adam Smith <calfrog208@me.com>

Tue 9/29/2020 9:50 PM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

would like to ask for your support of the City of Long Beach's SEASP planning document. This updated development plan will enhance coastal view corridors along Pacific Coast Highway, provide much-needed wetlands restoration, add new waterfront experiences, create additional bike and walking paths, and allow the business community an opportunity to re-image our commercial shopping centers. Additionally, when projects are implemented within this new development plan, equal consideration will be given to planning, environmental, and economical implications. This project seeks to create a holistic development plan instead of piecemeal projects which have detrimental impacts to the restoration efforts of the Los Cerritos Wetlands and our community. Finally, I believe that an updated SEASP plan will elevate the overall quality of life in South East Long Beach. I thank you for your support of this particularly important project.

Sincerely, Adam Smith

Sent from my iPhone

#### Support for SEASP, CCC Item TH 11AM

#### Dona Marinos <donamarinos@gmail.com>

Wed 9/30/2020 7:47 AM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

After many years of community input, the City of Long Beach adopted the Southeast Area Specific Plan.

SEASP will not only guide redevelopment in our community for the next generation, but it will also restore and preserve our neighboring Los Cerritos Wetlands for generations to enjoy.

SEASP will put into place design guidelines to enhance gateways, corridors, pedestrian and bicycle pathways, and public access to the marina, waterways, wetlands and parks.

We hope you will support this visionary plan for our local community!

Thank you for your consideration!

Sent from my iPad

#### Judi Evangelista <judievangelista@gmail.com>

Wed 9/30/2020 8:32 AM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

Hello,

I would like to ask for your support of the City of Long Beach's SEASP planning document. This updated development plan will enhance coastal view corridors along Pacific Coast Highway, provide much-needed wetlands restoration, add new waterfront experiences, create additional bike and walking paths, and allow the business community an opportunity to re-image our commercial shopping centers. Additionally, when projects are implemented within this new development plan, equal consideration will be given to planning, environmental, and economical implications. This project seeks to create a holistic development plan instead of piecemeal projects which have detrimental impacts to the restoration efforts of the Los Cerritos Wetlands and our community. Finally, I believe that an updated SEASP plan will elevate the overall quality of life in South East Long Beach. I thank you for your support of this particularly important project.

Sincerely, Judi Evangelista

\_\_\_

Sent from Gmail Mobile

#### Mark Bloeser <mark\_bloeser@hotmail.com>

Wed 9/30/2020 10:13 AM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

Dear Dani,

Four years ago, SEA Forward, a coalition of residents, community leaders, business, and property owners, came together to support this updated blueprint as it went before the Long Beach City Council for approval. The SEA Forward coalition is coming together again to support this project as it comes before the California Coastal Commission. This plan adds new mixed-use designations to the heart of the project area to create desired amenities, such as public plazas and paseos, and walking paths that connect our surrounding communities. This plan also establishes new design guidelines to enhance our gateways, corridors, and waterfront with new landscaping and strives to create a sense of place within our beautiful community.

I urge the California Coastal Commission to invest in the future of Long Beach and approve this forward-thinking planning document.

Sincerely, Mark Bloeser

#### sharlynh23@gmail.com <sharlynh23@gmail.com>

Wed 9/30/2020 10:48 AM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

I would like to express my support for SEASP. As a parent of young children, I support the creation of new coastal habitat wetlands and recreation, which will set aside 117 acres of land for coastal and visitor-serving resources for me and my children to enjoy. Without an update to SEASP the wetlands have the potential to be developed. I also like that the plan encourages the removal of old oil wells on existing wetlands parcels and consolidates oil operations onto a smaller parcel. I hope you will support this collective community vision for Southeast Long Beach. It has been a long and passionate debate over the last decade and at the conclusion of the planning process we have a well-balanced document that supports conservation of our coastal resources and responsible growth. Thank you for your time.

Sincerely, Sharlyn Ouzounian

#### Cassie Swan <cassieswan@gmail.com>

Wed 9/30/2020 11:19 AM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

I would like to express my support for SEASP. As a parent of young children, I support the creation of new coastal habitat wetlands and recreation, which will set aside 117 acres of land for coastal and visitor-serving resources for me and my children to enjoy. Without an update to SEASP the wetlands have the potential to be developed. I also like that the plan encourages the removal of old oil wells on existing wetlands parcels and consolidates oil operations onto a smaller parcel. I hope you will support this collective community vision for Southeast Long Beach. It has been a long and passionate debate over the last decade and at the conclusion of the planning process we have a wellbalanced document that supports conservation of our coastal resources and responsible growth. Thank you for your

Sincerely, Cassie Swan Long Beach, 90803

#### Jeff Boyce <jeffrboyce@gmail.com>

Wed 9/30/2020 11:53 AM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

I would like to ask for your support of the City of Long Beach's SEASP planning document. This updated development plan will enhance coastal view corridors along Pacific Coast Highway, provide much-needed wetlands restoration, add new waterfront experiences, create additional bike and walking paths, and allow the business community an opportunity to re-image our commercial shopping centers. Additionally, when projects are implemented within this new development plan, equal consideration will be given to planning, environmental, and economical implications. This project seeks to create a holistic development plan instead of piecemeal projects which have detrimental impacts to the restoration efforts of the Los Cerritos Wetlands and our community. Finally, I believe that an updated SEASP plan will elevate the overall quality of life in South East Long Beach. I thank you for your support of this particularly important project.

Sincerely, Jeff Boyce

#### Laurel Colonna < laurelcolonna@hotmail.com>

Wed 9/30/2020 3:16 PM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

Hi, my name is Laurel Lucas and my family and I are long time Long Beach residents. We own a house in the shore and have recently bought a house in Naples. Long Beach is such an amazingly diverse city and that's what we love about it. I love seeing new developments coming to fruition.

Four years ago, SEA Forward, a coalition of residents, community leaders, business, and property owners, came together to support this updated blueprint as it went before the Long Beach City Council for approval. The SEA Forward coalition is coming together again to support this project as it comes before the California Coastal Commission. This plan adds new mixed-use designations to the heart of the project area to create desired amenities, such as public plazas and paseos, and walking paths that connect our surrounding communities. This plan also establishes new design guidelines to enhance our gateways, corridors, and waterfront with new landscaping and strives to create a sense of place within our beautiful community. I urge the California Coastal Commission to invest in the future of Long Beach and approve this forward-thinking planning document.

Thank you for your consideration, Laurel Lucas

## **Laurel Lucas, Broker**

Colonna & Co. Realty, Inc. 203 Glendora Ave., Suite A Long Beach, CA 90803 P:(562)438.9735 C:(562)682.9110

F:(562)987.3106 DRE#: 01425980

#### Kristina Duggan < kristinaduggan@yahoo.com>

Wed 9/30/2020 3:21 PM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

I would like to express my support for SEASP. As a parent of young children, I support the creation of new coastal habitat wetlands and recreation, which will set aside 117 acres of land for coastal and visitor-serving resources for me and my children to enjoy. Without an update to SEASP the wetlands have the potential to be developed. I also like that the plan encourages the removal of old oil wells on existing wetlands parcels and consolidates oil operations onto a smaller parcel. I hope you will support this collective community vision for Southeast Long Beach. It has been a long and passionate debate over the last decade and at the conclusion of the planning process we have a well-balanced document that supports conservation of our coastal resources and responsible growth. Thank you for your time.

Sincerely,

Kristina Duggan

Kristina Duggan Administrator *Dr. Duggan & Associates* (714) 293-9604

#### Lee Vieira < Ivieira@ccmclending.com>

Wed 9/30/2020 4:12 PM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

Four years ago, SEA Forward, a coalition of residents, community leaders, business, and property owners including myself, came together to support this updated blueprint as it went before the Long Beach City Council for approval. The SEA Forward coalition is coming together again to support this project as it comes before the California Coastal Commission. This plan adds new mixed-use designations to the heart of the project area to create desired amenities, such as public plazas and paseos, and walking paths that connect our surrounding communities. This plan also establishes new design guidelines to enhance our gateways, corridors, and waterfront with new landscaping and strives to create a sense of place within our beautiful community. I believe this would be very good for the local area as well as Long Beach as a whole along with the surrounding communities. I urge the California Coastal Commission to invest in the future of Long Beach and approve this forward-thinking planning document.

Sincerely, Lee Vieira

#### Lee Vieira

Cherry Creek Mortgage Inc. 6615 E. Pacific Coast Highway #180 Long Beach, CA 90803 Phone (562) 799-8400 EFax (562) 799-8400 NMLS ID #289599 LeeV@ccmclending.com





#### SUPPORT for SEASP (CCC Item Thurs 11am)

#### Donna Medine <donna.medine@me.com>

Thu 10/1/2020 12:13 AM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

Members of the California Coastal Commission,

As a resident of the City of Long Beach, I am in full support of SEASP (CCC Item Thurs 11am).

The adoption of SEASP is imperative for our City to address many critical issues, including future housing needs and sustainable development. Under SEASP, the commercial corridor along PCH will be enhanced, bringing new retail opportunities, community gathering places, roadway improvements, and better utilization of our waterfront. And, SEASP will add new bike and walking paths, creating increased connectivity for residents and visitors alike.

Perhaps most importantly, SEASP complements our local wetlands, providing much needed wetlands restoration impact fees which will protect and expand this vital natural resource for our community and future generations.

Our current plan is old and outdated. It does not take into account advancements in technology and housing standards, or the need to protect our environment.

I urge the California Coastal Commission to adopt SEASP on October 8th. It is a smart and thoughtful plan for the future of Southeast Long Beach.

Gary DeLong <gary@garydelong.com>

Thu 10/1/2020 5:50 AM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

Four years ago, SEA Forward, a coali on of residents, community leaders, business, and property owners, came together to support this updated blueprint as it went before the Long Beach City Council for approval. The SEA Forward coali on is coming together again to support this project as it comes before the California Coastal Commission.

This plan adds new mixed-use designa ons to the heart of the project area to create desired ameni es, such as public plazas and paseos, and walking paths that connect our surrounding communi es. This plan also establishes new design guidelines to enhance our gateways, corridors, and waterfront with new landscaping and strives to create a sense of place within our beau ful community.

As the former Councilmember who represented this area between 2006 – 2014, I can think of no other area in Long Beach where the residents had such a strong interest in seeing the zoning updated.

I urge the California Coastal Commission to invest in the future of Long Beach and approve this forward-thinking planning document.

Sincerely,

Gary DeLong Former Councilmember City of Long Beach

#### SUPPORT for SEASP (CCC Item Thurs 11am)

#### Davis Fretwell <davisfretwell@gmail.com>

Thu 10/1/2020 6:01 AM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

Members of the California Coastal Commission,

As a resident of the City of Long Beach, I am in full support of SEASP (CCC Item Thurs 11am).

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Perhaps most importantly, SEASP complements our local wetlands, providing much needed wetlands restoration impact fees which will protect and expand this vital natural resource for our community and future generations.

Our current plan is old and outdated. It does not take into account advancements in technology and housing standards, or the need to protect our environment. The current status is an eye sore of oil derricks and broken concrete left from years ago.

I urge the California Coastal Commission to adopt SEASP on October 8th. It is a smart and thoughtful plan for the future of Southeast Long Beach.

-Davis Fretwell Sent from my iPhone

#### **SEASP**

#### Amy Gibson <br/> <br/> beautycountermommy@gmail.com>

Wed 9/30/2020 8:02 PM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

Hello Dani,

I would like to voice my support for SEASP. As a parent of elementary school children, I support the creation of new coastal habitat wetlands and recreation, which will set aside 117 acres of land for coastal and visitor-serving resources for me and my children to enjoy. Without an update to SEASP the wetlands have the potential to be developed. I also like that the plan encourages the removal of old oil wells on existing wetlands parcels and consolidates oil operations onto a smaller parcel. I hope you will support this collective community vision for Southeast Long Beach. It has been a long and passionate debate over the last decade and at the conclusion of the planning process we have a wellbalanced document that supports conservation of our coastal resources and responsible growth.

I appreciate your time and support.

Sincerely,

Amy Gibson Bixby Knolls Resident

#### SUPPORT for SEASP (CCC Item Thurs 11am)

Bryce Marquis <emailingbryce@gmail.com>

Wed 9/30/2020 8:05 PM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

Members of the California Coastal Commission,

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Perhaps most importantly, SEASP complements our local wetlands, providing much needed wetlands restoration impact fees which will protect and expand this vital natural resource for our community and future generations.

Our current plan is old and outdated. It does not take into account advancements in technology and housing standards, or the need to protect our environment.

I urge the California Coastal Commission to adopt SEASP on October 8th. It is a smart and thoughtful plan for the future of Southeast Long Beach.

they also promised to tear down the breakwater so do that too.

respectfully,

Bryce Marquis Long Beach Resident **United States Citizen** Rock, Flag and Eagle

#### Jared Lucas < jaredlucas 98@gmail.com>

Wed 9/30/2020 8:17 PM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

I would like to ask for your support of the City of Long Beach's SEASP planning document. This updated development plan will enhance coastal view corridors along Pacific Coast Highway, provide much-needed wetlands restoration, add new waterfront experiences, create additional bike and walking paths, and allow the business community an opportunity to re-image our commercial shopping centers. Additionally, when projects are implemented within this new development plan, equal consideration will be given to planning, environmental, and economical implications. This project seeks to create a holistic development plan instead of piecemeal projects which have detrimental impacts to the restoration efforts of the Los Cerritos Wetlands and our community. Finally, I believe that an updated SEASP plan will elevate the overall quality of life in South East Long Beach. I thank you for your support of this particularly important project.

Sincerely, Jared Lucas

#### **SEASP**

#### Anne Cramer <nolan@earthlink.net>

Thu 10/1/2020 9:21 AM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

Hello.

As a longtime resident of Long Beach, I am requesting your support of the community-driven SEASP planning document. SEASP seeks to preserve our most precious resource, our wetlands, while providing the opportunity for a more active waterfront community with amenities such as bike paths, walking trails, and public gathering spaces. SEASP seeks to balance responsible growth, while preserving the wetlands, and creating a world-class gateway into the eastern portion of our City, which residents have been seeking for years. The original plan, formerly known as SEADIP, was drafted in 1977. Since 2005 residents have requested the City of Long Beach update this important planning document. Over the last 15 years countless community meetings have been held, hours of staff time spent digesting community input and drafting this comprehensive planning document.

With all this in mind, I urge you to support our collective efforts to update SEASP.

Sincerely, Anne Cramer Long Beach, CA 90803

Sent from my iPhone

#### SUPPORT for SEASP (CCC Item Thurs 11am)

Brigitte Bigham <a href="mailto:bigham@coldwellbanker.com">brigitte.bigham@coldwellbanker.com</a>

Thu 10/1/2020 2:26 PM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

Members of the California Coastal Commission,

As a resident of the City of Long Beach, I am in full support of SEASP (CCC Item Thurs 11am).

The adoption of SEASP is imperative for our City to address many critical issues, including future housing needs and sustainable development. Under SEASP, the commercial corridor along PCH will be enhanced, bringing new retail opportunities, community gathering places, roadway improvements, and better utilization of our waterfront. And, SEASP will add new bike and walking paths, creating increased connectivity for residents and visitors alike.

Perhaps most importantly, SEASP complements our local wetlands, providing much needed wetlands restoration impact fees which will protect and expand this vital natural resource for our community and future generations.

Our current plan is old and outdated. It does not take into account advancements in technology and housing standards, or the need to protect our environment.

I urge the California Coastal Commission to adopt SEASP on October 8th. It is a smart and thoughtful plan for the future of Southeast Long Beach.

Thank you

Brigitte

Brigitte Bigham Broker Associate Lic # 01123170 Coldwell Banker Coastal Alliance (562) 857-5232

Your referrals are appreciated!

#### Khanh Vu <khanh\_n\_vu@hotmail.com>

Fri 10/2/2020 8:24 AM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

I would like to ask for your support of the City of Long Beach's SEASP planning document. This updated development plan will enhance coastal view corridors along Pacific Coast Highway, provide much-needed wetlands restoration, add new waterfront experiences, create additional bike and walking paths, and allow the business community an opportunity to re-image our commercial shopping centers. Additionally, when projects are implemented within this new development plan, equal consideration will be given to planning, environmental, and economical implications. This project seeks to create a holistic development plan instead of piecemeal projects which have detrimental impacts to the restoration efforts of the Los Cerritos Wetlands and our community. Finally, I believe that an updated SEASP plan will elevate the overall quality of life in South East Long Beach. I thank you for your support of this particularly important project.

Sincerely, Khanh Vu

Get Outlook for iOS

#### Rachael L <rachaellingle@gmail.com>

Fri 10/2/2020 9:59 AM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

I would like to express my support for SEASP. As a parent of young children, I support the creation of new coastal habitat wetlands and recreation, which will set aside 117 acres of land for coastal and visitor-serving resources for me and my children to enjoy. Without an update to SEASP the wetlands have the potential to be developed. I also like that the plan encourages the removal of old oil wells on existing wetlands parcels and consolidates oil operations onto a smaller parcel. I hope you will support this collective community vision for Southeast Long Beach. It has been a long and passionate debate over the last decade and at the conclusion of the planning process we have a well-balanced document that supports conservation of our coastal resources and responsible growth. Thank you for your time.

Sincerely, Rachael Lingle

#### RicardoTheRealtor.com 562-533-4003 <rtr@ricardotherealtor.com>

Fri 10/2/2020 2:46 PM

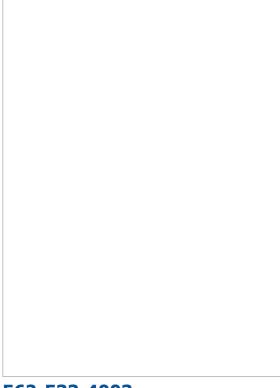
To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

Four years ago, SEA Forward, a coalition of residents, community leaders, business, and property owners, came together to support this updated blueprint as it went before the Long Beach City Council for approval. The SEA Forward coalition is coming together again to support this project as it comes before the California Coastal Commission. This plan adds new mixed-use designations to the heart of the project area to create desired amenities, such as public plazas and paseos, and walking paths that connect our surrounding communities. This plan also establishes new design guidelines to enhance our gateways, corridors, and waterfront with new landscaping and strives to create a sense of place within our beautiful community. I urge the California Coastal Commission to invest in the future of Long Beach and approve this forward-thinking planning document.

Sincerely, Ricardo Perdomo

## Sincerely,

**RTR** 



562-533-4003 **UniQre 01847698 RicardoTheRealtor Website** 

Long Beach Homes For Sale Facebook Ricardo The Realtor YouTube Videos

#### Jeff Hoffman < jhoffman@jeffhoffmanassociates.com>

Fri 10/2/2020 1:45 PM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov> Dear Members of the Coastal Commission,

Four years ago, SEA Forward, a coalition of residents, community leaders, business, and property owners, came together to support this updated blueprint as it went before the Long Beach City Council for approval. The SEA Forward coalition is coming together again to support this project as it comes before the California Coastal Commission. This plan adds new mixed-use designations to the heart of the project area to create desired amenities, such as public plazas and paseos, and walking paths that connect our surrounding communities. This plan also establishes new design guidelines to enhance our gateways, corridors, and waterfront with new landscaping and strives to create a sense of place within our beautiful community. As someone who lives and works adjacent the SEASP boundaries, I urge the California Coastal Commission to invest in the future of Long Beach and approve this forward-thinking planning document.

Sincerely,

Jeff Hoffman



Global CSR, Philanthropy & Civic Engagement

JEFF HOFFMAN

5500 East Second Street | Suite Five | Long Beach, California 90803 USA 562.438.5333

jhoffman@jeffhoffmanassociates.com

https://www.linkedin.com/in/hoffmanjeffrey

www.JeffHoffmanAssociates.com

#### Bob Lane <br/> <br/>blane@jeffhoffmanassociates.com>

Fri 10/2/2020 3:22 PM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

Dear Members of the Coastal Commission,

I would like to ask for your support of the City of Long Beach's SEASP planning document. This updated development plan will enhance coastal view corridors along Pacific Coast Highway, provide much-needed wetlands restoration, add new waterfront experiences, create additional bike and walking paths, and allow the business community an opportunity to re-image our commercial shopping centers. Additionally, when projects are implemented within this new development plan, equal consideration will be given to planning, environmental, and economical implications. This project seeks to create a holistic development plan instead of piecemeal projects which have detrimental impacts to the restoration efforts of the Los Cerritos Wetlands and our community. Finally, I believe that an updated SEASP plan will elevate the overall quality of life in South East Long Beach.

I thank you for your support of this particularly important project.

Sincerely,

**Bob Lane** 

**Bob Lane** Jeff Hoffman & Associates BLane@JeffHoffmanAssociates.com www.JeffHoffmanAssociates.com



Global Philanthropy & Civic Engagement

Amendment Request No. LCP-5-LOB-19-0008-1 (SEASP) of the City of Long Beach Certified Local Coastal Program, for Public Hearing and Commission Action at the virtual meeting October 7-9, 2020.

Dear Commissioners and Staff;

Staff has done an outstanding job of researching SEASP and have presented 16 suggested modifications to the City's plan. Because of the lack of time to go through all of the changes, I am urging the Commission **not to vote o**n this issue today. Please hold another hearing to give both the Commission and the public time address all of the many changes to this LCP. SEASP will be the zoning plan which will affect the whole area for many years and deserves more than a one day hearing.

I really have not had time to study all of staff's modifications, but here are my comments previously made on the SEASP EIR:

This Plan does not follow the objectives desired by the majority of the public who participated in the many public meetings.

#### **Objectives in the SEASP DEIR:**

- "To create a sustainable, feasible and effective plan, three primary planning "pillars" must be equally considered:
- Physical Benefits (amenities, design, placemaking)
- Environmental Benefits (conservation of coastal resources)
- Economic Benefits (can the proposed mix of uses be built under existing circumstances)"

### **Objectives of the Public:**

Find solutions for the grade D and F traffic in this area. Preserve and Restore the Los Cerritos Wetlands.

Even with the attempts at mitigating the effects of adding 5,429 dwelling units, 8,648 population increase, 560 more employees, the DEIR's conclusion was that the traffic impacts are considered <u>significant and unavoidable</u>. In other words, traffic will continue to be at D, E, and F levels at most of the intersections in the area and the added population will only worsen the problem to levels beyond F.

In addition to Transportation and Traffic, other Significant and Unavoidable impacts are: Air Quality, Cultural Resources,

**Greenhouse Gas Emissions, and Noise.** All of these Significant and Unavoidable Impacts render this Plan unacceptable.

I believe the EIR mitigations will not protect the plants and animals in the wetlands, especially the birds. In fact, the DEIR states:

5. Environmental Analysis BIOLOGICAL RESOURCES

"Implementation of the proposed Specific Plan could directly impact sensitive species and natural communities. [Thresholds B-1 and B-2]

"Artificial lighting at night has been demonstrated to significantly reduce or curtail the normal activity patterns of nocturnal animals by interfering with foraging, mating, nurturing young, other important social interactions. . . . The introduction of new buildings with increased heights in the proposed mixed-use areas or an interpretive center in the proposed Coastal Habitat, Wetlands & Recreation areas could impact sensitive habitat and wildlife in the LCWC and open space areas."

There are a number of suggested mitigations for lights, including:

Buildings shall be designed to minimize light spillage and maximize light shielding to the maximum feasible extent.

Building lighting shall be shielded and directed downward, up-lighting is prohibited. Use of "event" searchlights or spotlights shall be prohibited. Landscape lighting shall be limited to low-intensity and low-wattage lights. Red lights shall be limited to only that necessary for security and safety warning purposes, blue or green lights are a better option if the use of colored lights is desired.

However the DEIR states: <u>Even with these measures, new lighting</u> proposed within and adjacent to sensitive habitat could impact wildlife.

#### **Human Activities/Urban/Wetland Interface**

"The proposed Coastal Habitat, Wetlands & Recreation land use designation encourages trails and public viewing areas and allows for the development of visitor-serving recreation or an interpretive center. Additionally, the proposed Project would increase residential uses, increasing population in the Project area. The proposed uses and Specific Plan buildout would attract residents and visitors to the wetland areas.

Increased recreational use has damaging effects on wildlife due to trampling, bicycle use, and unregulated movement of domestic animals. The impact of human intrusion into sensitive biological resources could result in a significant impact."

There is a planned **bicycle/pedestrian path across** the northern section of the wetlands, adjacent to the Los Cerritos Channel, in spite of the dangers to wetlands flora and fauna. (see map on pg. 123 of Exhibit) Long Beach has numerous bike trails--one right next to the wetlands on the San Gabriel River. This is totally unneeded. All public trails should be be on the **perimeter** of the wetlands to protect the plant and animal species.

#### **5.4.4 Cumulative Impacts**

"Loss of native vegetation and habitat, on removal of mature trees, or excessive outdoor lighting could contribute to a cumulative impact. However, only a small area of wetland habitat would be impacted which would not result in a significant cumulative impact. The vast majority of wetlands in the LCWC would be preserved. With the mitigation required for the Project area, no significant cumulative impacts to biological resources".

With the loss of over 90% of California coastal wetlands, even a "small area of wetland habitat" is a significant impact. This mitigation is inadequate.

Avian Species – Bird Strikes

"Of the 26 **special status wildlife** species present in the specific plan area, 15 are birds. The LCWC provides habitat for a number of bird species and is part of the Pacific Flyway. However, **development that increases building heights near sensitive habitats**—Sims' Pond, Jack Dunster Marine Biological Reserve, LCWC, and all areas proposed to be designated Coastal Habitat, Wetlands & Recreation—has the potential to impact sensitive birds due to bird strikes. For example, a mixed-use development with a hotel component could allow up to seven stories in the Mixed Use Community Core or new industrial uses on the vacant Pumpkin Patch, adjacent to the wetlands."

"It is well established that buildings can pose a significant hazard to flying birds from collision. . . . About 90 percent of bird strikes with buildings are within the first 40 feet in height"

"In addition to the building, lighting, and landscaping requirements, height limitations are required within 100 feet of a wetland (see Section 7.1.5 of the Specific Plan, Special Edge Conditions, Wetlands Edge at Shopkeeper Road)."

Birds do not stay within 100 feet of a wetland. They fly in and out to forage, especially those nesting outside of the wetlands at the Seal Beach National Wildlife Refuge and Alamitos Bay. These are the ones who will be most impacted by 5-7 story buildings. Not just from birds hitting the buildings, but from the added energy needed to fly up over 5 to 7 stories of concrete. There are few nesting trees currently in the wetlands and none for Great Blue Herons who forage there. GBH make numerous trips a day to feed their young in nests on the Naval Weapons Station, Alamitos Bay and the Peninsula. Each trip over a 5 story building takes energy needed for hunting, catching of prey and flying. There was a good reason for limiting building height in the wetlands area to three stories and it should be retained.

Another issue that was barely addressed in the SEASP EIR is sea level rise. Many experts say retreat is wisest action, not new development in a threatened area.

The Commission must make **wetlands protection** their main goal, by refusing to allow new density in the area. This includes retaining the 100 foot buffer zone in all parts of the Los Cerritos Wetlands.

Again, I urge you to not vote on this very complicated issue today and give us all time for further study.

Sincerely

#### Ann Cantrell

Sierra Club Los Cerritos Wetlands Task Force

## FW: October 2020 City of Long Beach LCP Amendment No. LCP-5-LOB-19-0008-1 (SEASP)

#### SouthCoast@Coastal <SouthCoast@coastal.ca.gov>

Fri 10/2/2020 6:41 PM

To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>; Rehm, Zach@Coastal <Zach.Rehm@coastal.ca.gov>

**From:** Anna Christensen [mailto:annachristensen259@gmail.com]

**Sent:** Friday, October 02, 2020 5:00 PM

**To:** SouthCoast@Coastal

**Subject:** October 2020 City of Long Beach LCP Amendment No. LCP-5-LOB-19-0008-1 (SEASP)

RE

#### 11 Local Coastal Programs (LCPs)

a.

- b. City of Long Beach LCP Amendment No. LCP-5-LOB-19-0008-1 (SEASP)
- c. Public hearing and action on request by the City of Long Beach to amend the Land Use Plan (LUP) and the Implementation Plan (IP) of the certified LCP to repeal SEADIP (Southeast Area Development and Improvement Plan, PD-1), establish the Southeast Area Specific Plan, SEASP or SP-2, revert 9 acres of the specific plan area to conventional zoning, and certify previously deferred areas, including a portion of Los Cerritos Wetlands within the southeast area of Long Beach, Los Angeles County. (DZ-LB)

The Los Cerritos Wetlands Task Force, Sierra Club requests that the Coastal Commission

- 1. Postpone any vote on this agenda item as it concerns complex issues having great impacts on a large and sensitive coastal area that will affect coastal habitats and species, water ways and the ocean, and a significant number of humans over multiple generations to come.
- 2. Vote No on LCP Amendment No. LCP-5-LOB-19- 0008-1 (SEASP)

We cannot ignore the fact that SEADIP is being overthrown, not revised. A zoning overlay that was intended to keep population density relatively low in this area, in part to protect wetlands wildlife and also just because more density means more people, more noise, more traffic, more air pollution is being dissolved under pressure to expand the human footprint regardless of the consequences.

SEASP violates the original intent of SEADIP and lacks concern for the very community that worked to establish protections under SEADIP. The City wants to meet its new housing numbers at the expense of the wetlands, the community, and public safety while generating more revenue from massive developments. Coastal Commission staff concern for low-cost motels is warranted - but will the Commission really be able to keep the Golden Sails alive when the property will be zoned for 5 story condos? We think not.

In addition to ignoring the consequences of massively expanding the population along PCH between the San Gabriel River and Loynes Drive, by allowing multiple 5 and 7 story mixed use buildings, Coastal Commission staff also appears to ignore the Commission preference for managed retreat as regards sea

level rise. Please note that most of SEASP lies within a tsunami zone, at sea level, an area subject to liquefaction, along a major earthquake fault, adjacent to already approved oil operations that will expand current production by 800% and contribute 70,000 tons of GHG emissions annually into the SEASP area. The lack of concern for the consequences of a major expansion of both residential and commercial development is a slap in the face to the Coastal Commissions preference for managed retreat and a denial of the risks to both public and private entities assured by this reckless proposal.

Also, no real effort to include or address the tribal perspecitive.