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November 18, 2016

VIA ELECTRONIC MAIL

Craig Chalfant, Senior Planner
City of Long Beach
Development Services/Planning Bureau
333 West Ocean Boulevard, 5th Floor
Long Beach, California 90802
craig.chalfant@longbeach.gov

Re: LB General Plan LUE and UDE Project

Dear Mr. Chalfant:

I am writing on behalf of Long Beach Transportation and Parking Solutions, Inc. ("TAPS") in regards to the Final Draft EIR SCH No. 2015051054 (the "DEIR"). As you already know, TAPS was founded in 2014 to promote the social welfare of the residents of the City of Long Beach ("City") by working to rectify the transportation and parking problems that exist in the City. While we laud your plan for the development of Long Beach to accommodate its continuing growth and promote a better community, we are concerned about the EIR's failure to analyze the adequacy of parking in the General Plan LUE and UDE as proposed. We are particularly concerned because several objectives of the circulated DEIR and some of the data revealed by the DEIR suggest the project may have significant adverse effects in the City of Long Beach (the "City").

For example, the Land Use Element encourages "Public Rooms" adjacent to ground floor cafés and retail uses, space for which is likely to come out of our parking resources. See Section 3.5.2 of DEIR. Indeed the DEIR contains a picture of a sidewalk café where you can see cars parked in that part of the street just one building down. While we appreciate the plan's intent to "improve the interface between buildings and streets; develop areas along public sidewalks... design parking lots and access points to be pedestrian-friendly, provide buffers around streetscapes to buffer parking areas and promote walkability; provide bicycle infrastructure;

establish safe transit infrastructure; and design streetscapes utilizing sustainable streetscape strategies,” we are worried that the space for these amenities may come from the City’s parking stock. See Section 3.8 of DEIR. In a provided rendering for an example of a residential street, there is no parking pictured.

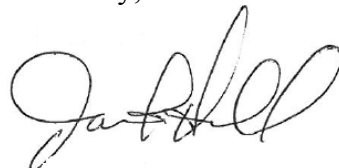
Additionally, the DEIR anticipates increases in traffic so severe that forty-four intersections, half of all intersections analyzed, will be significantly and unavoidably impacted. The single plan proposed to mitigate the traffic impact for a single intersection involve removing parking spaces on Alamitos Avenue, and do not even decrease the intersection’ traffic load classification. See Section 14.8.4 of DEIR. If the impacts on traffic are so severe, the impacts on parking are likely to be similarly severe. However, the adequacy of the parking stock was not analyzed in the DEIR. The DEIR anticipates an increase of population by 51,000, employment by 28,500, and total units by 11,744, which would significantly increase parking demands.

The DEIR did not ever seriously analyze the adequacy of parking, and this needs to be revisited. If the analysis is revisited, the City may adopt a plan that explicitly provides for meeting the increased parking demand rather than quietly condemning parking in favor of sidewalks and cafes. Had the DEIR considered parking, Alternative Three, Reduced VMT Alternative / Transit-Oriented Alternative may have been a much more attractive option, since it would result in reduced vehicle usage and parking demand.

The reasonably foreseeable environmental impacts that flow from the lack of parking must be analyzed under CEQA, and the DEIR as it has been circulated unfortunately does not address these impacts. We request that you consider meeting the parking demands for a growing city as an integral part of your plan for the City of Long Beach’s growth.

I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie T. Hall". The signature is fluid and cursive, with the first name "Jamie" being the most prominent part.

Jamie T. Hall