

VI. Other CEQA Considerations



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1. Significant Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2 (b) states:

Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to regional nitrogen oxide (NO_x) emissions and traffic. In addition, the Draft EIR analysis concluded that Project impacts would be cumulatively considerable with regard to regional NO_x emissions and traffic.

a. Air Quality

As discussed in Section IV.B, Air Quality, of this Draft EIR, regional emissions resulting from operation of the Project would exceed the South Coast Air Quality Management District (SCAQMD) daily threshold for NO_x. Therefore, regional emissions of NO_x generated by Project operation would also be cumulatively considerable. As such, Project operation would result in significant and unavoidable Project-level and cumulative impacts with regard to regional NO_x emissions.

b. Traffic

(1) Construction

As analyzed in Section IV.K, Traffic and Access, of this Draft EIR, the Project would result in temporary intersection impacts during construction. The Project would implement a Construction Management Plan pursuant to Mitigation Measure K-1, which would provide for traffic controls during any street closures, detours, or other disruption to traffic

circulation, as well as identify the routes that construction vehicles would use and the hours for transport of oversize loads. While this would minimize traffic impacts upon the local circulation system in the Project area and the impacts would be temporary/short-term, impacts would remain significant and unavoidable. Additionally, the Project's contribution to traffic impacts during construction would be cumulatively considerable. As such, construction-related cumulative traffic impacts would be significant and unavoidable.

(2) Operation

(a) Intersection Levels of Service

(i) Existing Plus Project

Implementation of the identified mitigation measures would reduce Project impacts at all study intersections impacted under Existing Plus Project Conditions to below a level of significance, using both City and Caltrans methodology. However, implementation of the mitigation measures would require the approval of the City of Long Beach, the City of Seal Beach, and/or Caltrans, as well as the acquisition of right-of-way, which cannot be guaranteed. As such, traffic impacts under Existing Plus Project Conditions would be significant and unavoidable.

(ii) Future Plus Project

Implementation of the identified mitigation measures would reduce Project impacts at all study intersections impacted under Future Plus Project Conditions to below a level of significance, using both City and Caltrans methodology. However, implementation of the mitigation measures would require the approval of the City of Long Beach, the City of Seal Beach, and/or Caltrans, as well as the acquisition of right-of-way, which cannot be guaranteed. As such, traffic impacts under Future Plus Project Conditions would be significant and unavoidable.

(b) Regional Transportation System

The Project would result in a significant impact at CMP Station No. 39 (Intersection No. 17: Pacific Coast Highway at 2nd Street). Implementation of Mitigation Measure K-5 would reduce Project impacts at Intersection No. 17 to a less than significant level. However implementation of this mitigation measure would require the approval of the City of Long Beach and Caltrans, as well as the acquisition of right-of-way, which cannot be guaranteed. As such, Project-level and cumulative impacts to a CMP arterial monitoring station would be significant and unavoidable.

(c) Caltrans Freeway

The Project would result in impacts to State Route 22 (SR-22). SR-22 is controlled exclusively by the State and there is no mechanism by which the lead agency (i.e., the City of Long Beach) can construct or guarantee the construction of any improvements to these freeways segments. Therefore, the Project's impacts on SR-22 are considered significant and unavoidable as there are no feasible mitigation measures that will reduce mainline impacts to below significance thresholds or achieve acceptable service level goals. As such, Caltrans freeway impacts would remain significant and unavoidable.

(d) Caltrans Ramps

The Project would result in impacts to SR-22 ramps. SR-22 is controlled exclusively by the State and there is no mechanism by which the lead agency (i.e., the City of Long Beach) can construct or guarantee the construction of any improvements to these freeways segments. Therefore, the Project's impacts on SR-22 are considered significant and unavoidable as there are no feasible mitigation measures that will reduce ramp impacts to below significance thresholds or achieve acceptable service level goals. As such, Caltrans freeway impacts would remain significant and unavoidable.

2. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identification of a project's significant unavoidable impacts, Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe the reasons why a project is being proposed, notwithstanding the effects of the identified significant and unavoidable impacts.

The reasons why the Project has been proposed are grounded in a comprehensive list of project objectives included in Section II, Project Description, of this Draft EIR and are further described below. The underlying purpose of the Project is to create a distinctive mixed-use commercial environment within the community by providing a blend of shopping and dining uses, open space, and amenities that collectively offer an active shopping and dining experience and rejuvenate an existing underutilized site. In the existing condition, the Project Site is underutilized. The Project would redevelop the Project Site and create a southeastern gateway to the City that is welcoming, iconic in nature, and visible from a distance. The new commercial uses would strengthen the economic vitality of the City by providing property tax, sales tax, and other revenues, as well as construction-related and permanent employment opportunities. The Project is intended to provide a high level of accessibility to and throughout the site to ensure a safe pedestrian environment, efficient vehicular access, convenient bicycle facilities, and access to mass transit. Where none

exist today, the Project would incorporate sustainability features, green building design elements, and landscaping that promote resource conservation, waste reduction, and efficient water management. The Project would also provide a distinctive, high quality, commercial environment that maximizes the variety of uses on-site to support the needs of nearby residents and businesses and attract future businesses, employers, and visitors.

Three alternatives to the Project were considered in Section V, Alternatives, of this Draft EIR. As discussed therein, no feasible alternative was identified that would eliminate the Project's significant and unavoidable NO_x emissions or traffic impacts. While the No Project/Reoccupation of Existing Hotel Alternative would avoid the Project's significant environmental impacts with respect to NO_x, such an alternative would not meet the underlying purpose of the Project or any of the Project objectives supporting that purpose, and as such, is not considered a feasible development alternative. Additionally, this alternative would not eliminate all of the Project's significant and unavoidable traffic impacts.

3. Significant Irreversible Environmental Changes

In accordance with Section 15126.2(c) of the CEQA Guidelines, an EIR is required to evaluate significant irreversible environmental changes that would be caused by implementation of the proposed project. As stated in CEQA Guidelines Section 15126.2(c), "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvements which provide access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The Project would necessarily consume limited, slowly renewable, and non-renewable resources, resulting in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation and the associated impacts related to air quality.

a. Building Materials and Solid Waste

Construction of the Project would require consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable.

These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics).

During construction and operation of the Project, the Project would comply with Assembly Bill (AB) 939, which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. During operation, the Project would also comply with AB 341 which promotes commercial recycling and AB 1826 which requires organic waste recycling. Additionally, the City of Long Beach Department of Public Works, Environmental Services Bureau implements several waste reduction programs, including the Litter-Free Long Beach Campaign, which is designed to expand awareness of the impacts of litter, build community pride, and develop the support and participation of Long Beach residents, schools and businesses. The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would comply with AB 939, AB 341, AB 1826 and City goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Thus, the consumption of non-renewable building materials, such as lumber, aggregate materials, and plastics, would be reduced. Furthermore, as discussed in the Initial Study prepared for the Project and included as Appendix A of this Draft EIR, Project impacts with respect to solid waste generation and compliance with federal, state, and local solid waste regulations would be less than significant.

b. Water

Project consumption of water during construction and operation of the Project is addressed in Section IV.L.1, Utilities and Service Systems—Water Supply, of this Draft EIR. As discussed therein, construction-related water demand would result in a temporary increase and would occur incrementally throughout construction of the Project. Construction-related water demand would be offset by the reduction in water consumption resulting from the demolition of the existing SeaPort Marina Hotel. In addition, the Project's operational water demand would fall within the projected water supplies for average, single-dry, and multiple-dry years, and the Long Beach Water Department (LBWD) would be able to meet the water demand for the Project in addition to the existing and planned water demands of its future service area. Furthermore, the Project would incorporate "green" principles to comply with the City of Long Beach Green Building Ordinance (Ordinance No. ORD-09-0013) and the sustainability intent of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED[®]) program at the Certified level (or equivalent), including water conservation features such as use of recycled water for irrigation and water-efficient plumbing fixtures. Thus, as evaluated in Section IV.L.1, Utilities and Service Systems—Water Supply, of this Draft EIR, while Project operation

would result in the irreversible consumption of water, the Project would not result in a significant impact related to water supply.

c. Energy Consumption and Air Quality

During ongoing operation of the Project, non-renewable fossil fuels would represent the primary energy source, and thus the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Construction activities for the Project would not require the consumption of natural gas, but would require the use of fossil fuels and electricity. As the consumption of fossil fuels would occur on a temporary basis during construction, impacts related to the construction consumption of fossil fuels would be less than significant.

Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.L.2, Utilities and Service Systems—Energy, of this Draft EIR. As evaluated therein, the Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of Long Beach Gas and Oil Department and the Southern California Edison, respectively. In addition, the estimates of electrical and natural gas consumption are conservative and do not factor in reductions in consumption from the implementation of energy conservation features. Specifically, as discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, "green" principles are incorporated throughout the Project to comply with the City of Long Beach Green Building Ordinance (Ordinance No. ORD-09-0013) and the sustainability intent of the U.S. Green Building Council's LEED® program at the Certified level (or equivalent). Energy conservation features incorporated into the Project design include shielding exterior light fixtures to limit light pollution and glare, commissioning all building envelope and energy consuming systems to ensure efficient operations and reduce both operational and maintenance costs, and meeting or exceeding Title 24, Part 6 California Energy Code baseline standard requirements for energy efficiency, based on the 2016 Energy Efficiency Standards requirements. Implementation of energy conservation features would ensure energy would not be used in a wasteful manner, and long-term impacts associated with the consumption of fossil fuels would not be significant.

d. Environmental Hazards

The Project's potential use of hazardous materials is addressed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR. As evaluated therein, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in commercial developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. During Project construction activities,

the temporary use of potentially hazardous materials, including fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be used, handled, and stored on the Project Site. Furthermore, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials.

e. Conclusion

Based on the above, Project construction and operation would require the irretrievable commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Project Site for future generations or for other uses. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant.

4. Growth-Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Growth can be induced or fostered as follows:

- Direct growth associated with a project;
- Indirect growth created by either the demand not satisfied by a project or the creation of surplus infrastructure not utilized by a project.

The Project would construct a commercial development comprising approximately 245,000 square feet of gross floor area, including approximately 95,000 square feet of retail uses, a 55,000-square-foot grocery store, a 25,000-square-foot fitness/health club, and 70,000 square feet of restaurant uses, including 40,000 square feet of full service dining, 25,000 square feet of fast food, and 5,000 square feet of ready-to-eat dining. The Project would not introduce a new residential population to the area, but would introduce a day-time population of visitors to Project Site. Upon buildout, the Project is anticipated to employ a total of 903 persons, including approximately 720 full-time employees and 183 part-time employees.¹ Therefore, given that the Project would not directly contribute to population growth in the Project area and as most of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Therefore, the Project would be well within the Southern California Association of Governments' (SCAG's) population projection for the Los Angeles Subregion.

With regard to employment, the Project's commercial and restaurant use would be intended to serve residents and visitors to the area. Therefore, the Project would not cause an exceedance of SCAG's employment projections, nor would it induce substantial indirect population or housing growth related to Project-generated employment opportunities.

Construction workers would not be expected to relocate their households' places of residence as a direct consequence of working on the Project as the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Therefore, given the availability of construction workers, the Project would not be considered growth inducing from a short-term employment perspective, but rather the Project would provide a public benefit by providing new employment opportunities during the construction period.

The area surrounding the Project Site is already developed with residential, commercial, institutional uses, and natural wetland communities. The Project would not remove impediments to growth. While the Project may require local infrastructure

¹ *Employment estimate provided by HR&A Advisors, Inc.*

upgrades to maintain and improve water, sewer, electricity, and natural gas lines on-site and in the immediate vicinity of the Project Site, such improvements would be intended primarily to meet Project-related demand, and would not necessitate regional utility infrastructure improvements that have not otherwise been accounted for and planned for on a regional level. In addition, the Project would not require any major roadway improvements, and access improvements would be limited to driveways necessary to provide immediate access to the Project Site.

Overall, the Project would be consistent with the growth forecast for the Los Angeles Subregion, and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled. Therefore, growth-inducing impacts would be less than significant.

5. Potential Secondary Effects

Section 15126.4(a)(1)(D) of the CEQA Guidelines requires that “if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed.” With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project was reviewed. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, for those environmental issue areas where mitigation is proposed.

a. Biological Resources

Mitigation Measure IS-1 would require vegetation removal be scheduled outside of nesting season for raptor and songbird species (typically February 15 through August 31). In the event any construction activities occur during nesting season, a survey shall be conducted and a buffer zone established in the event nesting birds were identified. This mitigation measure would reduce impacts to nesting birds to a less than significant level.

b. Cultural Resources

Mitigation Measure C-1 requires a qualified archaeologist be retained to implement the other cultural resource mitigation measures. Mitigation Measure C-2 requires that if unknown archaeological and/or historic materials are discovered during any grading or excavation activity, work in the area shall cease and deposits shall be treated in accordance with applicable federal, State, and local guidelines, including those set forth in

California Public Resources Code Section 21083.2. Mitigation Measure C-3 requires that if human remains are discovered during construction or excavation, work in the affected area and the immediate vicinity shall be halted immediately and the Native American Heritage Commission and the County Coroner shall be notified pursuant to procedures and requirements set forth in California Health and Safety Code Section 7050.5. Disposition of the human remains and any associated grave goods shall also be in accordance with this regulation and Public Resources Code 5097.91 and 5097.98, as amended. Mitigation Measure C-4 states that if any paleontological materials are encountered during ground-disturbing activities, all further ground-disturbing activities in the area shall be temporarily diverted and the services of a qualified paleontologist shall then be secured. The paleontologist shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource, as appropriate. Mitigation Measure C-5 requires that Native American monitors be granted access to the Project Site, and Mitigation Measure C-6 requires that archaeological testing be conducted concurrently with geotechnical core testing. Both Mitigation Measures C-5 and C-6 would require implementation of Mitigation Measures C-1 through C-3 in the event any archaeological resources are found. These mitigation measures represent procedural actions and would be beneficial in protecting cultural resources that could potentially be encountered on-site. As such, the implementation of these mitigation measures would not result in physical changes to the environment and would not result in adverse secondary impacts.

c. Geology and Soils

Mitigation Measure D-1 requires that the Project incorporates the site-specific requirements regarding liquefaction, liquefaction-induced settlement, and lateral spreading set forth in a final, site-specific geotechnical report. Mitigation Measure D-2 requires that soils on-site shall be treated according to the recommendations of a final, site-specific geotechnical report to reduce differential settlement on the Project Site. Implementation of these mitigation measures would reduce potential geotechnical impacts to a less than significant level. As such, implementation of these mitigation measures would not result in adverse secondary impacts.

d. Hazards and Hazardous Materials

Mitigation Measure F-1 requires the preparation of a project-specific Soil Management Plan prior to the start of construction, which shall incorporate, but will not be limited to: (1) Geophysical Survey; (2) Soil Vapor Survey/Health Risk Screening; (3) Transportation Plan; and (4) fugitive dust control measures. Mitigation Measure F-2 requires a geophysical survey to locate subsurface features or anomalies, if any, that may

pose an environmental concern or present a risk of upset at the Project Site, prior to subsurface disturbance and demolition activities. Mitigation Measure F-3 requires that prior to construction, a systematic soil vapor survey of the Project Site to investigate the possible presence of volatile organic compounds in site soils is conducted. Mitigation Measure F-4 requires that at the completion of the soil vapor survey, a qualified environmental professional shall use the results of the survey to develop a health risk screening that assesses health and safety concerns associated with volatile organic compound levels at the site for construction workers and future site users. Mitigation Measure F-5 requires that prior to construction, pre-construction removal activities, including sampling, as necessary, to characterize waste, removal action, off-site disposal of characterized waste, and confirmation sampling of removal areas be conducted. Mitigation Measure F-6 requires that during site demolition and construction phases, the Project Applicant shall ensure that in the event any suspected oil sumps, mud pits, or areas of dark stained soils are identified, these locations shall be added to the site plans included in the Soil Management Plan. Mitigation Measure F-7 requires that a Soils Transportation Plan is developed. Mitigation Measure F-8 requires that the Project control fugitive dust in accordance with SCAQMD rules. Mitigation Measure F-9 requires that a qualified contractor shall perform an asbestos and lead-based paint-containing-materials survey prior to demolition activities.

The Project would result in less than significant impacts related to off-site transport and disposal of hazardous materials. However, prior to mitigation, the Project would result in potentially significant impacts related to hazardous materials released during construction activities that could expose construction workers and the public to health risks associated with soil and groundwater contamination, oil field-related contamination and infrastructure, the presence of ACMs and lead, and the potential existence of a former landfill. Implementation of Mitigation Measures F-1 through F-9 would reduce these impacts to a less than significant level. Mitigation Measure F-4 would also reduce the potential for residual post-construction impacts associated with contaminated soils. Therefore, impacts after mitigation would be less than significant. As such, implementation of these mitigation measures would not result in adverse secondary impacts.

e. Traffic and Access

Mitigation Measure K-1 requires preparation and implementation of a Construction Management Plan to minimize construction impacts on the road network which would not result in secondary impacts. Mitigation Measures K-2 through K-12 require various improvements to intersections impacted by the Project. Construction of the intersection improvements would comply with all applicable regulations, design standards, and mitigation measures discussed throughout this Draft EIR. Therefore, no adverse secondary impacts would occur as a result of implementation of these mitigation measures.

6. Effects Not Found To Be Significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for the Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each topical area is or is not analyzed further in the EIR. The City of Long Beach determined through the Initial Study that the Project would result in less than significant impacts with respect to agricultural and forestry resources, biological resources, mineral resources, population and housing, schools, libraries, parks and recreation, wastewater, and solid waste. A summary of the analysis provided in Appendix A for these issue areas is provided below.

a. Agricultural and Forestry Resources

The Project Site is located in an urbanized area of the City of Long Beach and does not include any agricultural land. The Project Site is not zoned for agricultural or forest uses, and no agricultural or forest lands occur on-site or in the Project area. Therefore, the Initial Study concluded that no impacts related to agricultural and forestry resources would occur, and no further evaluation in an EIR is required.

b. Biological Resources

The Project Site is located in an urbanized area of the City of Long Beach and does not contain sensitive habitat or support any sensitive species. There are no federally protected waters or wetlands, as defined by Section 404 of the Clean Water Act, within the Project Site. The nearest viable habitat is the Los Cerritos Wetlands is located approximately 2,000 feet from the Project Site and is separated by intervening streets and urban development. Potential impacts to nesting birds protected by the Migratory Bird Treaty Act would be fully mitigated by Mitigation Measure IS-1, which calls for avoidance of nesting season, and surveys in the event nesting season cannot be avoided.

c. Mineral Resources

The Project Site is located within an urbanized area and has been previously disturbed by development. Although oil extraction activities historically occurred on-site, no mineral extraction operations currently occur or have occurred on the Project Site since development of the SeaPort Marina Hotel in the 1960s. Furthermore, the Project Site is not classified by the City as an area containing significant mineral deposits nor is the Project Site located in a mineral producing area as classified by the California Geological Survey.

Therefore, the Initial Study concluded that no impacts related to mineral resources would occur, and no further evaluation in an EIR is required.

d. Population and Housing

The Project does not propose the development of residential uses and would not directly contribute to population growth within the Project Site area. While Project construction would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, new permanent residents generally would not be generated during Project construction. With respect to Project operation, the proposed commercial uses would include a range of full-time and part-time commercial and retail positions that are typically filled by persons already residing in the vicinity of the workplace and who generally do not relocate their households for such employment opportunities. As such, the Project would be unlikely to create new households in the area or generate an indirect demand for additional housing. As such, the Project would not result in a notable increase in demand for new housing, and any new demand, should it occur, would be minor in the context of forecasted growth for the City. In addition, Project Site is currently occupied by a hotel and does not include any existing dwelling units, and thus would not displace any existing housing. Therefore, the Initial Study concluded that impacts related to population and housing would be less than significant, and no further evaluation in an EIR is required.

e. Public Services

(1) Schools

The development of commercial retail and restaurant uses would not result in a direct generation of school-aged children and a demand for school services within the Long Beach Unified School District service area. In addition, the number of new students that could be indirectly generated by the Project would be minimal as the Project is not anticipated to induce a substantial number of persons to change their residence as a result of gaining employment at the Project Site. Furthermore, pursuant to Senate Bill 50, the Applicant would be required to pay development fees for schools to the Long Beach Unified School District prior to the issuance of building permits, which is considered mitigation of Project-related school impacts. Therefore, the Initial Study concluded that impacts related to schools would be less than significant, and no further evaluation in an EIR is required.

(2) Parks and Recreation

The Project would include the development of commercial retail and restaurant uses, which does not typically create a great demand for parks and recreational facilities. The Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Furthermore, it is anticipated that utilization of nearby parks and/or recreational facilities by new employees generated by the Project would be nominal. Thus, new demand for public parks and recreational facilities associated with Project development would be limited. Therefore, the Initial Study concluded that impacts related to parks and recreation would be less than significant, and no further evaluation in an EIR is required.

(3) Libraries

Project development of commercial retail and restaurant uses would not result in the direct generation of residents. Thus, implementation of the Project would not result in a direct increase in the number of residents within the service population of the Bay Shore Branch Library, located approximately 1.1 miles northwest of the Project Site. Furthermore, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Therefore, the Initial Study concluded that impacts related to library services would be less than significant, and no further evaluation in an EIR is required.

f. Utilities and Service Systems

(1) Wastewater²

Wastewater generated during operation of the Project would be collected and discharged into existing sewer mains and conveyed to the Joint Water Pollution Control Plant (JWPCP) in the City of Carson. Wastewater generated by the Project during operation would be typical of retail and restaurant uses. The Project would generate approximately 106,510 gallons per day (gpd) of wastewater, which equates to a peak flow of 0.280 cubic feet per second (cfs). When accounting for the existing on-site uses, the Project would result in a net increase in wastewater generation of approximately 72,408 gpd, which equates to a peak flow of 0.205 cfs. The Project's net increase in wastewater would represent approximately 0.05 percent of the available capacity at the JWPCP.

² *This discussion of Project wastewater generation differs from the discussion published in the Initial Study. Additional information was provided by the Sanitation Districts of Los Angeles County in response to the publication of the NOP and the Initial Study. These changes are reflected here. Source: Psomas, "Psomas Review—1/25/2017," January 25, 2017, included as Appendix W of this Draft EIR.*

Furthermore, as the JWPCP is in compliance with the State's wastewater treatment requirements, the Project would not exceed the wastewater treatment requirements of RWQCB.

Wastewater from the Project currently flows through an existing 12-inch diameter sewer main located in 2nd Street. When the Project's flows are added to the existing 12-inch sewer main, total flows in the sewer main would be 0.905 cfs and the sewer main would continue to operate below the standard acceptable operating limit capacity of 75 percent. Therefore, the existing wastewater infrastructure would have adequate capacity to accommodate the Project's net increase in wastewater flows. Given the amount of wastewater expected to be generated by the Project, existing wastewater treatment capacity, and future wastewater treatment capacity, adequate wastewater treatment capacity would be available to serve the Project Site. Therefore, impacts related to wastewater would be less than significant, and no further evaluation in an EIR is required.

(2) Solid Waste

Construction of the Project would generate construction and demolition wastes that would be recycled or collected by private waste haulers contracted by the Applicant and taken for disposal at the County's inert landfills. The Initial Study concluded that the Project would generate a total of approximately 46,334 tons of demolition debris and approximately 879 tons of construction debris, for a combined total of 47,213 tons of construction-related waste generation. This would represent approximately 0.08 percent of the existing remaining disposal capacity of 59.83 million tons for the unclassified landfill accepting waste from the City. Therefore, the Initial Study concluded that construction-related impacts related to solid waste would be less than significant, and no further evaluation in an EIR is required.

The Initial Study concluded that the Project would generate approximately 8,205 pounds per day (lbs/day) of solid waste upon completion. The existing uses to be removed are estimated to generate approximately 730 lbs/day of solid waste, thus the Project would result in a net increase of approximately 7,474 lbs/day of solid waste. The estimated solid waste generated by the Project would represent approximately 0.3 percent of the daily solid waste disposed of by the City. Furthermore, the solid waste generated by the Project would represent approximately 0.01 percent of the remaining daily disposal capacity of the County's Class III landfills open to the City. Therefore, the Initial Study concluded that impacts related to solid waste would be less than significant, and no further evaluation in an EIR is required.