

April 2022 | Final Environmental Impact Report
State Clearinghouse No. 2020010387

CENTURY VILLAGES AT CABRILLO SPECIFIC PLAN

City of Long Beach

Prepared for:

City of Long Beach

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Table of Contents

Section	Page
1. INTRODUCTION	1-1
1.1 INTRODUCTION	1-1
1.2 FORMAT OF THE FEIR.....	1-1
1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES	1-2
2. RESPONSE TO COMMENTS.....	2-1
3. REVISIONS TO THE DRAFT EIR	3-1
3.1 INTRODUCTION	3-1
3.2 DEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS.....	3-1
4.3.8 Public Services and Utilities	3-1

APPENDICES

Appendix A. Monarch Butterfly Overwintering Survey

Table of Contents

LIST OF TABLES	
Table	Page
Table 4-2 Public Service and Utility Providers.....	3-1

1. Introduction

1.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §§ 21000 et seq.) and CEQA Guidelines (California Code of Regulations §§ 15000 et seq.).

According to the CEQA Guidelines, Section 15132, the FEIR shall consist of:

- (a) The Draft Environmental Impact Report (DEIR) or a revision of the Draft;
- (b) Comments and recommendations received on the DEIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies comments on the DEIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

This document contains responses to comments received on the DEIR for the Century Villages at Cabrillo Specific Plan (Specific Plan) during the public review period, which began June 18, 2021, and closed August 2, 2021. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated DEIR comprise the FEIR, in accordance with CEQA Guidelines, Section 15132.

1.2 FORMAT OF THE FEIR

This document is organized as follows:

Section 1, Introduction. This section describes CEQA requirements and content of this FEIR.

Section 2, Response to Comments. This section provides a list of agencies and interested persons commenting on the DEIR; copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number (A1 through A4).

Section 3. Revisions to the Draft EIR. This section contains revisions to the DEIR as a result of the comments received by agencies and interested persons as described in Section 2, and/or errors and omissions discovered subsequent to release of the DEIR for public review.

1. Introduction

The responses to comments contain material and revisions that will be added to the text of the FEIR. City of Long Beach staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the DEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the Project will result in a significant new environmental impact not previously disclosed in the DEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of DEIRs should be “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines Section 15204 (c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this FEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on DEIRs.

2. Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency (City of Long Beach) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DEIR and prepare written responses.

This section provides all written responses received on the DEIR and the City of Long Beach's responses to each comment.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the DEIR are excerpted in this document, the sections are shown indented. Changes to the DEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the DEIR during the public review period.

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
Agencies & Organizations			
A1	City of Long Beach Energy Resources Department	June 30, 2021	2-3
A2	Los Angeles County Sanitation Districts	August 2, 2021	2-9
A3	California Department of Fish and Wildlife	August 2, 2021	2-15
A4	California Department of Transportation	August 3, 2021	2-39

2. Response to Comments

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2. Response to Comments

LETTER A1 – City of Long Beach Energy Resources Department (3 pages)

From: [Jane Hermen](#)
To: [Anita Juhola-Garcia](#)
Cc: [Jorge Estrada](#); [Nicole Morse](#); [LBGasDeveloperProjects](#)
Subject: RE: Notice of Availability of DEIR for Century Villages at Cabrillo Specific Plan (Long Beach)
Date: Wednesday, June 30, 2021 8:26:11 AM
Attachments: [image001.png](#)
[image003.png](#)

Hi Anita

Energy Resources has reviewed the draft EIR document attached and had some comments to note. The City of Long Beach Energy Resources Department is the natural gas service provider for this development and all customers within the City of Long Beach and Signal Hill. The document does reference our old department name, Gas & Oil, and SoCalGas. For consistency, would recommend that the most recent department name be incorporated throughout the document (and others too) to reflect the most current information.

A1-1

I have added comments to the document attached and also summarized below.

Page #	Comment	
3-29	Change "Long Beach Energy Resources" to "City of Long Beach Energy Resources Department"	A1-2
4-8	Add "Department" after Energy Resources in Table 4-2	A1-3
5.4-1	Energy service provider is City of Long Beach Energy Resources Department	A1-4
5.4-8	Paragraph on SoCalGas – only LBER provides gas service in the City	A1-5
5.4-13	Change "Gas and Oil" to "Energy Resources"	A1-6
5.16-1	Section 5.16 mentions utilities include natural gas service. Who performed and where would the technical report or analysis be for impacts to natural gas system to provide service to this development?	A1-7
5.16-26	If natural gas is included under "Other Utilities" the regulatory agency that oversees natural gas is a federal agency (PHMSA)	A1-8
5.16-28	Change "Long Beach Energy Resources" to "City of Long Beach Energy Resources Department"	A1-9
5.16-31	- Change "Gas and Oil" to "Energy Resources" (2 locations) - "The forecast net increase is well within City forecasts ... therefore, would not require the City to obtain new or expanded natural gas supplies" Was a high level analysis performed on the impacts to the net increase on LBER's pipeline system? How was this verified?	A1-10
General	Review document to reflect current name change for Energy Resources Department	A1-11

Also, there are mentions that the net natural gas consumption for the Specific Plan of this development will not have significant impacts to the gas system. Who performed this analysis to confirm this and was Energy Resources involved to verify this information? Provided this is at the edge of the system, we would like to see the analysis or model to make sure and confirm there is enough flow to meet the demand of the system with our existing pipeline infrastructure and significant improvements are not needed as that may have financial impacts to this development in

A12

2. Response to Comments

the future.

Please feel free to contact me if you have any further questions or concerns.

A1-12
CONT'D

Warm Regards,

Jane Hermesen, PE, PMP, LEED AP
Senior Mechanical Engineer

Long Beach Energy Resources Dept | Engineering and Regulatory Compliance
2400 E Spring Street | Long Beach, CA 90806
Office: 562.570.2059 | Mobile: 562.688.1358

ER logo_color



From: Nicole Morse <NMorse@tbplanning.com>

Sent: Thursday, June 17, 2021 8:41 AM

Cc: Anita Juhola-Garcia <Anita.Juhola-Garcia@longbeach.gov>; Jorge Estrada
<jestrada@placeworks.com>

Subject: Notice of Availability of DEIR for Century Villages at Cabrillo Specific Plan (Long Beach)

-EXTERNAL-

On behalf of the City of Long Beach please see the attached Notice of Availability of a Draft Environmental Impact Report for Century Villages at Cabrillo Specific Plan (Long Beach).

The public review period extends from **June 18, 2021 through August 2, 2021**.

The Specific Plan and DEIR can be viewed on the City of Long Beach website at the following address:
<http://www.longbeach.gov/lbds/planning/environmental/reports/>.

PROJECT DESCRIPTION: The Project Applicant, Century Housing Corporation, is requesting a Zoning Ordinance, Zoning Map Amendment, and a Specific Plan to redevelop portions of the Plan Area over the next 10 years (early 2023 to 2033). The Specific Plan is part of a collection of planning documents that effectively guide the services, housing, amenities, and programming for the Plan Area. The Specific Plan regulates the Plan Area's allowable land use, circulation, open space, and development standards, and provides the basis for the Leadership in Environmental and Energy Design (LEED)–Neighborhood Development (ND) certification documentation obtained by CVC in 2019. Implementation of the Project requires a Zoning Ordinance Amendment, Zoning Map Amendment, and adoption of the Specific Plan.

Century Villages at Cabrillo Specific Plan

Implementation of the Project involves the demolition of 235 dwelling units, 10,030 square feet of amenities, 10,200 square feet of educational uses, and 7,250 square feet of administrative and support services, and removal of 153 parking spaces; and the subsequent development of 750 dwelling units, 77,000 square feet of amenities, 15,000 square feet of educational uses, 17,000 square feet of

2. Response to Comments

commercial/retail uses, 48,000 square feet of administrative and supportive services, and 518 parking spaces. Buildout of the Plan Area under the Specific Plan will result in a total of 1,380 dwelling units, 79,350 square feet of amenities, 15,000 square feet of educational uses, 22,850 square feet of commercial/retail uses, and 67,050 square feet of administrative and supportive services, and 877 parking spaces.

The Specific Plan also includes a central transit center and dedicated bicycle and pedestrian facilities. The existing and proposed buildings will range between 15 and 80 feet in height and will be arranged around a series of outdoor spaces and community amenities. Each new development accommodated by the Specific Plan will have residential units on the upper levels and ground floors occupied by consolidated bike and automobile parking, along with flexible spaces that can host service providers, administrative functions, and community amenities. New buildings will have a mix of units, including housing for veterans and nonveterans. New residential development will replace aging dwelling units while expanding affordable housing options for veterans, non-veterans, families, and individuals.

Nicole Morse, Esq.
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2. Response to Comments

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2. Response to Comments

A1. **Response to Comments from City of Long Beach Energy Resources Department, Jane Hermesen, Senior Mechanical Engineer, dated June 30, 2021.**

- A1-1 The commenter states that the Draft Environmental Impact Report (DEIR) makes reference to the City of Long Beach Energy Resources Department's (LBERD's) old department name, Gas & Oil, and also makes reference to SoCalGas. For consistency, the commenter recommends that the most recent department name be incorporated throughout the DEIR to reflect the most current information (see also comments A1-2 through A1-11). In response to this comment, various sections of the DEIR have been revised accordingly. The text revisions are described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- A1-2 In response to this comment, the text has been corrected on page 3-29 of the DEIR. The text revisions are described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- A1-3 In response to this comment, the text has been corrected on page 4-8 of the DEIR. The text revisions are described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- A1-4 In response to this comment, the text has been corrected on page 5.4-1 of the DEIR. The text revisions are described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- A1-5 In response to this comment, the text has been corrected on page 5.4-8 of the DEIR. The text revisions are described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- A1-6 In response to this comment, the text has been corrected on page 5.4-13 of the DEIR. The text revisions are described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- A1-7 The commenter requested clarification on who performed the technical analysis for impacts to the natural gas system and where that analysis can be found. PlaceWorks performed the analysis, and it can be found in Sections 5.4, *Energy*, and 5.16, *Utilities and Service Systems*, of the DEIR.
- A1-8 The comment states that the regulatory agency that oversees natural gas is a federal agency. The comment is noted. No response is necessary.
- A1-9 In response to this comment, the text has been corrected on page 5.16-28 of the DEIR. The text revisions are described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.

2. Response to Comments

- A1-10 In response to this comment, the text has been corrected on page 5.16-31 of the DEIR. The text revisions are described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- The natural gas demand calculations and analysis provided in the Greenhouse Gas Emissions and Energy sections of the DEIR were based on South Coast Air Quality Management District's CalEEMod default generation numbers, which are overly conservative. Although the DEIR's analysis is conservative, the actual demand would be much lower because the Project would only require natural gas for water boilers, in order to reduce the need for and dependence on natural gas and reduce any potential impact to LBERD's natural gas infrastructure system serving the Project site. The Project Applicant has committed to using electric ranges on a go forward basis in all of the new buildings proposed; not using gas appliances in any of the supportive service/administrative spaces and buildings; and solely using gas to fire water boilers. It is anticipated that limiting the use of natural gas to only fire water boilers would not result in an impact to LBERD's natural gas infrastructure system.
- A1-11 In response to this comment, various sections of the DEIR have been revised accordingly. The text revisions are described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- A1-12 The commenter is requesting a model to ensure there is enough flow to meet the natural gas demand of the systems with existing pipeline infrastructure. As stated in response to Comment A1-10, the assumptions used to determine natural gas demand were overly conservative. The Project will limit the use of natural gas for water boilers only which will not result in an impact to LBERD's natural gas infrastructure system.

2. Response to Comments

LETTER A2 – Los Angeles County Sanitation Districts (3 pages)



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante

Chief Engineer and General Manager

1955 Workmen Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

August 2, 2021

Ref. DOC 6222903

Ms. Anita Juhola-Garcia
City of Long Beach
Development Services Department
411 West Ocean Boulevard
Long Beach, CA 90802

Dear Ms. Juhola-Garcia:

NOA Response to DEIR for Century Villages at Cabrillo Specific Plan

The Los Angeles County Sanitation Districts (Districts) received a Notice of Availability of a Draft Environmental Impact Report (NOA) for the subject project on June 17, 2021. The proposed project is located within the jurisdictional boundary of District No. 3. Previous comments submitted by the Districts in correspondence dated March 2, 2020 (copy enclosed) still apply to the subject project with the following comments and updated information:

1. **5.16.1.3 ENVIRONMENTAL IMPACTS—pages 5.16-5:** The project description provided within the subject DEIR is described as 515 dwelling units; 66,970 square feet (sq. ft.) of amenities; 4,800 sq. ft. education space; 17,000 sq. ft. commercial/retail space; and 40,750 sq. ft. of service/administrative space. Based on this project description, the expected increase in average wastewater flow from the project site is 105,021 gallons per day, after the structures on the project site are demolished. Please adjust figures throughout the document to reflect the aforementioned information. A2-1
2. **5.16.1.3 ENVIRONMENTAL IMPACTS—pages 5.16-5:** The document repeatedly refers to the Long Beach Water Reclamation Plan (LBWRP), indicating wastewater generated by the proposed project will be treated at the LBWRP. As stated in the enclosed NOP Response Letter, the wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant (JWPCP). The JWPCP currently processes an average flow of 259.6 million gallons per day. As such, the waste discharge requirements for the subject project are detailed in NPDES No. CA0053813, Order No. R4-2017-0180. Please update subsequent calculations accordingly. A2-2

All other information concerning Districts' facilities and sewerage service contained in the document is current. If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743 or at mandyng@lacsd.org.

Very truly yours,

Mandy Ng

Mandy Ng
Environmental Planner
Facilities Planning Department

MMN:mmn

Enclosure

cc: A. Schmidt
A. Howard

DOC 6267336.D03

2. Response to Comments



Robert C. Ferrante
Chief Engineer and General Manager
1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

March 2, 2020

Ref. DOC 5552516

Ms. Anita Juhola-Garcia, Planner
Development Services Department
City of Long Beach
411 West Ocean Boulevard
Long Beach, CA 90802

Dear Ms. Juhola-Garcia:

NOP Response to Century Villages at Cabrillo Specific Plan

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on January 28, 2020. The proposed project is located within the jurisdictional boundary of District No. 3. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project site will discharge to local sewer lines, which are not maintained by the Districts, for conveyance to the Districts' Pico Avenue Trunk Sewer, located in Fashion Avenue at the alleyway south of 12th Street. The Districts' 36-inch diameter trunk sewer has a capacity of 15 million gallons per day (mgd) and conveyed a peak flow of 6.7 mgd when last measured in 2018. A2-3
2. The wastewater generated by the proposed project site will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently produces an average flow of 261.1 mgd. A2-4
3. The expected increase in average wastewater flow from the project site, described in the document as 535 dwelling units, 66,970 square feet of amenities, 48,000 square feet education space, 17,000 square feet of commercial/retail space, 40,750 square feet of service/administrative space, and 1,208,776 square feet of residential other space, is 147,000 gallons per day, after the existing structures specified in the document are demolished. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the Table 1, Loadings for Each Class of Land Use link. A2-5
4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will A2-6

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2. Response to Comments

Ms. Anita Juhola-Garcia

-2-

March 2, 2020

be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

A2-6
CONT'D

5. In order for the District to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of District wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of District facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of District treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the District intends to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of District facilities.

A2-7

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: A. Schmidt
A. Howard

DOC 5645549.D03

2. Response to Comments

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2. Response to Comments

A2. Response to Comments from Los Angeles County Sanitation Districts, Mandy Ng, Environmental Planner, dated August 2, 2021.

- A2-1 The commenter states that at Project completion, the expected increase in average wastewater flow from the Project site would be 105,021 gallons per day, and requested that this be reflected in the Draft Environmental Impact Report (DEIR). In response to this comment, the updated wastewater generation number has been provided in Section 5.16, *Utilities and Service Systems*, of the DEIR and other sections of the DEIR where necessary. The text revisions are described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- A2-2 The commenter states that the incorrect water reclamation plant was mentioned in the DEIR. It was clarified that the wastewater generated by the proposed Project will be treated at the Joint Water Pollution Control Plant and not the Long Beach Water Reclamation Plant. In response to this comment, the correct plant name has been provided in Section 5.16, *Utilities and Service Systems*, of the DEIR and other sections of the DEIR where necessary. The text revisions are described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- A2-3 The commenter provided clarification on LACSD's trunk sewer details and capacity serving the Project site. In response to this comment, the trunk sewer details and capacity has been provided in Section 5.16, *Utilities and Service Systems*, of the DEIR. The text revisions are described in more detail in Section 3, *Revisions to the Draft EIR*, of this FEIR.
- A2-4 The commenter states that the wastewater generated by the Project site will be treated at the Joint Water Pollution Control Plant, which has adequate capacity. See response to Comment A2-2, above.
- A2-5 The commenter provides a revised wastewater generation total for the Project. See response to Comment A2-1, above.
- A2-6 The commenter states that LACSD charges a fee for the privilege of connecting (directly or indirectly) to LACSD's sewerage system for increasing the strength or quantity of wastewater discharged from connected facilities. Payment of a connection fee will be required before the Project is permitted to discharge to the LACSD's sewerage system. The comment is noted and the City will ensure through its development review process that the Project Applicant pays the necessary connection fee.
- A2-7 The commenter states that the available capacity of LACSD's treatment facilities is limited to levels associated with the approved growth identified by the Southern California Association of Governments. Therefore, the comment letter does not constitute a guarantee of wastewater service, but is to advise the developer that LACSD intends to provide this service up to the levels that are legally permitted and to inform the developer


2. Response to Comments

of the current existing capacity and any proposed expansion of LACSD facilities. The comment is noted and no response is necessary.


2. Response to Comments

LETTER A3 - California Department of Fish and Wildlife (17 pages)

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov



GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

August 2, 2021

Ms. Anita Juhola-Garcia
City of Long Beach
411 W. Ocean Boulevard
Long Beach, CA 90802
anita.juhola-garcia@longbeach.gov

**Subject: Century Villages at Cabrillo Specific Plan, Draft Environmental Impact Report,
SCH # 2020010387, City of Long Beach, Los Angeles County**

Dear Ms. Juhola-Garcia:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) from the City of Long Beach (City; Lead Agency) for the Century Villages at Cabrillo Specific Plan (Project). The Project is proposed by Century Housing Corporation (Project Applicant). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

A3-1

2. Response to Comments

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Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 2 of 17

Project Description and Summary

Objective: The Project proposes to redevelop portions of a former 27-acre U.S. Naval housing facility over 10 years beginning in 2023. The Project site has undergone redevelopment since 2011, which included creation of new housing, streets, and parking. The Project would transition the collection of antiquated structures and underutilized areas to modern affordable housing and service facilities along with key site improvements. The Project would demolish 235 dwelling units; 10,030 square feet of amenities; 10,200 square feet of educational uses; 7,250 square feet of administrative and support services; and removal of 153 parking spaces. New development under the Project will include 750 dwelling units; 77,000 square feet of amenities; 15,000 square feet of educational uses; 17,000 square feet of commercial/retail uses; 48,000 square feet of administrative and supportive services; and 518 parking spaces.

A3-2

Location: The Project is located on the western edge of the City of Long Beach at 2001 River Avenue. The majority of the buildings that would be demolished and the majority of new development would occur along Williams Street and toward the north end of San Gabriel Avenue.

Comments and Recommendations

CDFW visited the Project site with the Project Applicant on July 22, 2021. Based on the documents for review and the site visit, CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

A3-3

Specific Comments

Comment #1: Potential Impacts on Monarch Butterflies

Issue: The Project may impact monarch butterfly (*Danaus plexippus* population 1 – California overwintering population) and monarch butterfly overwintering habitat.

Specific impacts: The Project could remove and impact potential overwintering habitat for monarch butterflies. Vegetation removal and tree trimming could have a negative effect on monarch butterflies by causing injury or mortality; reducing health and vigor; and reducing reproductive success. Permanent or temporary impacts on overwintering habitat could result in local population decline or local extirpation of monarch butterflies.

A3-4

Why impacts would occur: In western North America, monarch overwintering sites are distributed along the California coast from Mendocino County to the Mexican border, and south into Baja California, Mexico (Xerces Society 2017). Monarch butterflies cluster in large groups in forested groves along the California coast. The Project site could provide an overwintering grove for monarch butterflies because of its location relative to the coast, proximity to known overwintering sites, and support of forested groves.

2. Response to Comments

DocuSign Envelope ID: E9B4022E-FAC2-4896-ACB2-DAF69796138B

Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 3 of 17

The Project site is located within 2.5 miles from the coast and two miles east of Banning Park and Museum. Banning Park is an overwintering site for monarchs (Western Monarch Count 2021). According to iNaturalist, monarch butterflies were observed on tropical milkweed (*Asclepias curassavica*) in the community garden located at the intersection of San Gabriel Avenue and West Willard Street in the northwest part of the Project site (iNaturalist 2020). During the site visit, monarch butterflies were observed in the community garden, as well as two additional areas: a second community garden located in the southeast corner of the Project site and in urban forest parallel to San Gabriel Avenue on the west side of the Project site. Forested groves occur throughout the Project site consisting of mature eucalyptus (*Eucalyptus* genus) and pine (*Pinus* genus) trees. These and other species of trees within the Project site could provide overwintering habitat.

The Project may require trees to be removed or trimmed in order to facilitate building demolition and construction. Removing trees during the overwintering period could have direct impacts on monarch butterflies, potentially resulting in injury or mortality; reduced health and vigor; and reduced success during spring and summer migration to breeding sites. Furthermore, removing trees could reduce or eliminate overwintering habitat, potentially leading to local population decline or local extirpation of monarch butterfly.

Evidence impact would be significant: The DEIR does not provide any information as to the Project's potential impacts on monarch butterflies and overwintering habitat. CDFW is unable to determine if and comment on whether the Project would impact monarch butterflies and overwintering habitat, where impacts would occur, where impacts would occur, and if impacts would be significant.

Monarch numbers have dropped by 99 percent from an estimated 4 million butterflies just twenty years ago (CDFW 2021a). Given the precipitous decline of monarch butterflies, the monarch butterfly is currently slated to be listed in 2024 under the Endangered Species Act (CDFW 2021a). The monarch butterfly is included on CDFW's [Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) list and identified as a Species of Greatest Conservation Need in California's [State Wildlife Action Plan](#) (CDFW 2017; CDFW 2015). Additionally, Fish and Game Code section 1002 prohibits the take or possession of wildlife for scientific research, education, or propagation purposes without a valid Scientific Collection Permit issued by CDFW. This applies to handling monarchs, removing them from the wild, or otherwise taking them for scientific or propagation purposes, including captive rearing. Fish and Game Code section 1021 directs CDFW to take feasible actions to conserve monarch butterflies and the habitats they depend upon for successful migration. Lastly, Fish and Game Code section 1374 directs the Monarch Butterfly and Pollinator Rescue Program, administered by the Wildlife Conservation Board, to recover and sustain populations of monarch butterflies.

The monarch butterfly meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Impacts on the monarch butterfly may require a mandatory finding of significance because the Project would have the potential to threaten to eliminate a plant or animal community and/or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, § 15065). The reduction in the number of monarch butterflies, either directly or indirectly through habitat loss, would constitute a significant impact absent appropriate mitigation. Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a

A3-4
CONT'D

2. Response to Comments

DocuSign Envelope ID: E9B4022E-FAC2-4896-ACB2-DAF69796138B

Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 4 of 17

candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW and/or U.S. Fish and Wildlife Service (USFWS).

A3-4
CONT'D

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: If the Project site supports an overwintering grove/population of monarchs, CDFW recommends the City require the Project Applicant to protect, manage, enhance, and restore potential overwintering habitat on the Project site. The City should require the Project Applicant to prepare a long-term Monarch Butterfly Overwintering Habitat Management Plan in consultation with a qualified biologist. A Monarch Butterfly Overwintering Habitat Management Plan should be submitted to the City before the City adopts the Century Villages at Cabrillo Specific Plan and a Long Beach Zoning Ordinance and Zoning Map Amendment. The Monarch Butterfly Overwintering Habitat Management Plan should provide actions to protect, manage, enhance, and restore overwintering habitat. At a minimum, these actions should include:

- **Protect:** Trees should not be removed in overwintering groves unless a tree poses a safety risk. The critical root zone (CRZ) of trees that are not targeted for removal should be protected. Impacts to a tree's CRZ could result in injury or mortality of the tree causing additional loss of trees and canopy. Shrubs should not be removed in overwintering groves. Shrubs should be maintained to provide a buffer to preserve the microclimate conditions of the overwinter habitat.
- **Manage:** Management activities, such as tree trimming and mowing, should be conducted in groves from March 15 through September 15 outside of the estimated timeframe when monarchs are likely present in the southern California coast.
- **Enhance:** Enhance native, insecticide-free nectar sources by planting fall/winter blooming forbs or shrubs within overwintering groves.
- **Restore:** Any trees removed as part of the Project should be replaced with trees at no less than 2:1. Native insecticide-free trees should be planted such as Monterey pine (*Pinus radiata*), Monterey cypress (*Cupressus macrocarpa*), Coast redwood (*Sequoia sempervirens*), coast live oak (*Quercus agrifolia*), Douglas fir (*Pseudotsuga menziesii*), Torrey pine (*Pinus torreyana*), western sycamore (*Platanus racemosa*), bishop pine (*Pinus radiata*) and others, as appropriate for location.
- **Pesticides:** Use of pesticides should be avoided, particularly when monarchs may be present. If pesticides are used, applications should be conducted from March 15 through September 15, when possible. Herbicide should not be applied on blooming flowers. Herbicide should be applied during young plant phases, when plants are more responsive to treatment, and when monarchs and other pollinators are less likely to be nectaring on the plants. Whenever possible, targeted application herbicide methods should be used, large-scale broadcast applications should be avoided, and precautions shall be taken to limit off-site movement of herbicides (e.g., drift from wind and discharge from surface water flows). Neonicotinoids or other systemic insecticides, including coated seeds, should not be used any time of the year in monarch habitat due to their ecosystem persistence, systemic nature, and toxicity. Soil fumigants should not be used. Non-chemical weed control techniques should be used when possible.
- **Tropical milkweed and pathogens:** Non-native tropical milkweed should not be planted in order to minimize the spread of the pathogen *Ophryocystis elektroscirrha* (OE), and to encourage natural monarch migration. OE can build up on tropical milkweed because these plants are evergreen, and they do not die back in the winter. OE can be debilitating and/or lethal to monarchs. If possible, tropical milkweed should be removed

A3-5

2. Response to Comments

DocuSign Envelope ID: E9B4022E-FAC2-4896-ACB2-DAF69796138B

Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 5 of 17

and replaced with native, insecticide-free nectar plants suitable for the location.

Mitigation Measure #2: If the Project site does not support overwintering habitat, CDFW recommends the City require the Project Applicant to avoid and minimize impacts on monarch butterflies by enhancing native, insecticide-free nectar sources; avoid planting any additional tropical milkweeds; and avoid using pesticides, insecticides, and soil fumigants.

A3-6

Recommendation #1: CDFW recommends the following resources for information on managing monarch overwintering habitat:

- [Western Monarch Butterfly Conservation Plan](#) (WAFWA 2019);
- [Overwintering Site Management and Protection](#) (Western Monarch Count 2021);
- [Protecting California's Butterfly Groves](#) (Xerces Society 2017);
- [Managing Monarch Habitat in the West](#) (Xerces Society 2021);
- [Monarch Butterfly Nectar Plant Lists for Conservation Plantings](#) (Xerces Society 2018);
- [Tropical Milkweed](#) (Wheeler 2018); and
- CDFW's [Monarch Butterfly](#) webpage page (CDFW 2021a).

A3-7

Recommendation #2: CDFW recommends the City require the Project Applicant to retain a qualified biologist to conduct an overwintering grove habitat and impact assessment for the Project site. The qualified biologist should conduct season appropriate surveys to determine if the Project site supports overwintering groves/monarch population. The assessment should provide information on where overwintering habitat is located; what Project activities would impact overwintering habitat; what are the impacts (e.g., number and species of trees removed); where impacts would occur; and measures to avoid, minimize, or mitigate for those potential impacts. CDFW recommends the City require an assessment to be performed prior to finalizing the Project's environmental document.

A3-8

Recommendation #3: CDFW recommends the City recirculate the Project's environmental document after the habitat assessment to disclose information on monarch butterflies and potential overwintering habitat in the Project site; potential impacts on those biological resources; and measures to avoid, minimize, or mitigate for Project impacts. Per CEQA Guidelines section 15088.5, "a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification."

A3-9

Comment #2: Impacts on Nesting Birds

Issue: The Project's environmental document has not provided any measures to minimize or mitigate for potential impacts on nesting birds and raptors.

Specific impacts: Project construction and activities could result in nest abandonment or decreased feeding frequency. This could result in increased nestling mortality thus significant impacts on nesting birds.

A3-10

Why impacts would occur: The Project site is less than one mile west of the lower Los Angeles River. The Audubon Society has identified the lower Los Angeles River as a [California Important Bird Area](#) (Audubon Society 2021). According to eBird, two bird hotspots are located less than one mile from the Project site (eBird 2021). These hotspots are the *Los Angeles River*.

2. Response to Comments

DocuSign Envelope ID: E9B4022E-FAC2-4896-ACB2-DAF69796138B

Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 6 of 17

south of Willow St. to PCH and Avila Park. Furthermore, the Project site supports mature trees and provides canopy cover such as eucalyptus, pines, palms, and sycamores (*Platanus* genus). In the greater Los Angeles, urban forests and street trees, both native and some non-native species, provide habitat for a high diversity of birds (Wood and Esaian 2020). Some species of raptors have adapted to and exploited urban areas for breeding and nesting (Cooper et al. 2020). For example, raptors such as red-tailed hawks (*Buteo jamaicensis*) and Cooper's hawks (*Accipiter cooperii*) can nest successfully in urban sites.

Birds and raptors nesting within the Project site could be impacted by the Project. The Project would include building demolition, grading, trenching, and paving. These activities create elevated levels of noise, human activity, dust, ground vibrations, vegetation disturbance, and potentially ambient nighttime lighting. These activities occurring near potential nests could cause birds to abandon their nests, resulting in the loss of fertile eggs or nestlings.

Evidence impact would be significant: Nests of all birds and raptors are protected under State laws and regulations, including Fish and Game Code, sections 3503 and 3503.5. Fish and Game Code section 3503 states, "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird." Fish and Game code section 3503.5 prohibits the take, possession, or destruction of birds-of-prey and their nests or eggs. Also, take or possession of migratory nongame birds designated in the Federal Migratory Bird Treaty Act of 1918 is prohibited under Fish and Game Code section 3513. As such, impacts on nesting birds and raptors, either directly or indirectly through nest abandonment, reproductive suppression, or loss of occupied nesting habitat, would be a significant impact absent appropriate mitigation. Inadequate avoidance, minimization, and mitigation measures for impacts on nesting birds and raptors will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special status by CDFW or USFWS.

A3-10
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Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: To protect nesting birds and raptors that may occur on site or adjacent to the Project site, CDFW recommends that no construction should occur from February 15 (January 1 for raptors) through August 31.

A3-11

Mitigation Measure #2: If avoidance is not feasible, a qualified biologist should complete a survey for nesting bird activity within a 500-foot radius of a construction site. Nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential nesting, roosting, and perch sites. Surveys should be conducted no more than 7 days prior to the beginning of any Project-related activity likely to impact nesting birds and raptors. If Project activities are delayed or suspended for more than 7 days during the breeding season, surveys should be repeated before activities can begin or restart.

A3-12

Mitigation Measure #3: If nesting birds and/or raptors are identified, CDFW recommends the following minimum no-disturbance buffers be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests, and 0.5 mile around active CESA or Endangered Species Act-listed bird nests. These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. These buffers should be increased, if necessary, to protect the nesting birds.

A3-13

2. Response to Comments

DocuSign Envelope ID: E9B4022E-FAC2-4896-ACB2-DAF69796138B

Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 7 of 17

Mitigation Measure #4: The temporary halt of Project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. If the Project would result in loss of nesting or breeding habitat for birds and raptors, CDFW recommends the City require the Project Applicant to compensate for the removal of any nesting habitat within the Project site. This should include trees and the appropriate understory plantings. The City should require the Project Applicant provide at least 2 trees for each one removed or impacted. The number of replacement trees should be higher for impacts on native trees, substantially large trees (e.g., heritage-sized trees), and trees with a dense canopy. The number of replacement trees should be higher if the trees removed/impacted supports a California Species of Special Concern. The number should increase even more with the occurrence of a CESA-listed species. The City should require the Project Applicant to consult with CDFW to determine proper mitigation for impacts to habitat supporting sensitive or special-status bird species.

A3-14

Comment #3: Impacts on Bats

Issue: The Project includes activities that may remove or disturb roosting habitat for bats.

Specific impacts: Project activities may include removal or disturbance of trees and structures that could provide roosting habitat for bats. Accordingly, the Project has the potential to injure, cause mortality, trap, and displace bats.

Why impacts would occur: Many bat species can be found year-round in urban areas throughout the south coast region of California. In urbanized areas, bats use trees and man-made structures for daytime and nighttime roosts. Trees and crevices in buildings in the Project site could provide roosting habitat for bats. Many of the buildings in the Project site have barrel tiled roofs. Barrel tiled roofs may provide roosting habitat. Roof tiles need not be damaged for bats to use them. Bats can fit into very small seams, as small as a ¼ inch.

The Project may result in direct impacts on bats (injury and mortality) by removing trees and demolishing structures that may provide roosting habitat. Indirect impacts on bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground disturbing activities (e.g., staging, access, excavation, grading), and vibrations caused by heavy equipment. Extra noise, vibration, or the reconfiguration of large objects can lead to the disturbance of roosting bats which may have a negative impact on the animals. Modifications to roost sites can have significant impacts on the bats' usability of the roost and can impact the bats' fitness and survivability (Johnston et al. 2004). Human disturbance can lead to a change in humidity, temperatures, or the approach to a roost that could force the animals to change their mode of egress and/or ingress to a roost. Although temporary, such disturbance can lead to the abandonment of a maternity roost (Johnston et al. 2004).

A3-15

Evidence impacts would be significant: Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Several bat species are considered [California Species of Special Concern](#) (SSC). A California Species of Special Concern is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- is extirpated from the State or, in the case of birds, is extirpated in its primary season or

2. Response to Comments

DocuSign Envelope ID: E9B4022E-FAC2-4896-ACB2-DAF69796138B

Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 8 of 17

breeding role;

- is listed as FESA-, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed;
- is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or,
- has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status (CDFW 2021b).

A3-15
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CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065). Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species by CDFW.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Where Project-related implementation, construction, and activities would occur near potential roosting habitat for bats, CDFW recommends a qualified bat specialist conduct bat surveys within these areas (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. CDFW recommends using acoustic recognition technology to maximize detection of bats. A survey report, including negative findings should be provided to the City. Depending on the survey results, a qualified bat specialist should discuss potentially significant effects of the Project on bats and provide species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist should be completed and submitted to the City prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.

A3-16

Mitigation Measure #2: If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in trees at a given location, during tree removal, trees should be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees should be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree should then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts should not be bucked or mulched immediately. A period of at least 24 hours, and preferable 48 hours, should elapse prior to such operations to allow bats to escape.

A3-17

Mitigation Measure #3: If maternity roosts are found, to the extent feasible, work should be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to September 30).

A3-18

2. Response to Comments

DocuSign Envelope ID: E9B4022E-FAC2-4896-ACB2-DAF69796138B

Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 9 of 17

Mitigation Measure #4: If maternity roosts are found and the City determines that impacts are unavoidable, a qualified bat specialist should conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat. Acoustic recognition technology should be used to maximize the detection of bats. Each tree identified as potentially supporting an active maternity roost should be closely inspected by the bat specialist no more than 7 days prior to tree disturbance to determine the presence or absence of roost bats more precisely. If maternity roosts are detected, trees/structures determined to be maternity roosts should be left in place until the end of the maternity season. Work should not occur within 100 feet of or directly under or adjacent to an active roost. Work should also not occur between 30 minutes before sunset and 30 minutes after sunrise.

A3-19

Additional Recommendations

Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species detected by completing and submitting [CNDDB Field Survey Forms](#) (CDFW 2021b). The City should ensure the data has been properly submitted, with all data fields applicable filled out, prior to finalizing/adopting the environmental document. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. The City should require the Project Applicant to provide CDFW with confirmation of data submittal prior to adopting the Century Villages at Cabrillo Specific Plan.

A3-20

Mitigation and Monitoring Reporting Plan. CDFW recommends the City update the Project's proposed Biological Resources Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist the City in developing mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

A3-21

Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the City of Long Beach and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

A3-22

Conclusion

We appreciate the opportunity to comment on the Project to assist the City of Long Beach in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City of Long Beach has to our

A3-23

2. Response to Comments

DocuSign Envelope ID: E9B4022E-FAC2-4896-ACB2-DAF69796138B

Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 10 of 17

comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Ruby Kwan-Davis, Senior Environmental Scientist (Specialist), at Ruby.Kwan-Davis@wildlife.ca.gov or (562) 619-2230.

A3-23
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Sincerely,

DocuSigned by:

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A3-24

2. Response to Comments

DocuSign Envelope ID: E9B4022E-FAC2-4896-ACB2-DAF69796138B

Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 11 of 17

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A3-24
CONT'D

2. Response to Comments

DocuSign Envelope ID: E5B4022E-FAC2-4596-ACB2-DAF69796138B

Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 12 of 17

Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources (BIO)			
	Mitigation Measure (MM) or Recommendation (REC)	Timing	Responsible Party
MM-BIO-1- Impacts on Monarch Butterflies- Management Plan	<p>If the Project site supports an overwintering grove/population of monarchs, the Project Applicant shall prepare a long-term Monarch Butterfly Overwintering Habitat Management to provide actions to protect, manage, enhance, and restore overwintering habitat. These actions shall include, at a minimum:</p> <ul style="list-style-type: none"> Protect: Trees shall not be removed in overwintering groves unless a tree poses a safety risk. The critical root zone (CRZ) of trees that are not targeted for removal shall be protected. Shrubs shall not be removed in overwintering groves. Shrubs shall be maintained to provide a buffer to preserve the microclimate conditions of the overwinter habitat. Manage: Management activities shall be conducted in groves from March 15 through September 15, such as tree trimming and mowing, in monarch overwintering habitat outside of the estimated timeframe when monarchs are likely present in the southern California coast. Enhance: Enhance native, insecticide-free nectar sources by planting fall/winter blooming forbs or shrubs within overwintering groves. Restoration: Any trees removed as part of the Project shall be replaced with trees at no less than 2:1. Native insecticide-free trees shall be planted such as Monterey pine (<i>Pinus radiata</i>), Monterey cypress (<i>Cupressus macrocarpa</i>), Coast redwood (<i>Sequoia sempervirens</i>), coast live oak (<i>Quercus agrifolia</i>), Douglas fir (<i>Pseudotsuga menziesii</i>), Torrey pine (<i>Pinus torreyana</i>), western 	Before the City adopts the Century Villages at Cabrillo Specific Plan and a Long Beach Zoning Ordinance and Zoning Map Amendment	City of Long Beach (City)/Project Applicant

A3-24
CONT'D

2. Response to Comments

DocuSign Envelope ID: E5B4022E-FAC2-4596-ACB2-DAF69796138B

Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 13 of 17

	<p>sycamore (<i>Platanus racemosa</i>), bishop pine (<i>Pinus radiata</i>) and others, as appropriate for location. Replacement trees may include eucalyptus trees.</p> <ul style="list-style-type: none"> • Pesticides: Use of pesticides shall be avoided, particularly when monarchs may be present. If pesticides are used, applications shall be conducted from March 15 through September 15, when possible. Herbicide shall not be applied on blooming flowers. Herbicide shall be applied during young plant phases, when plants are more responsive to treatment, and when monarchs and other pollinators are less likely to be nectaring on the plants. Whenever possible, targeted application herbicide methods shall be used, large-scale broadcast applications shall be avoided, and precautions shall be taken to limit off-site movement of herbicides (e.g., drift from wind and discharge from surface water flows). Neonicotinoids or other systemic insecticides, including coated seeds, shall not be used any time of the year in monarch habitat due to their ecosystem persistence, systemic nature, and toxicity. Soil fumigants shall not be used. Non-chemical weed control techniques shall be used when possible. • Tropical milkweed and pathogens: Non-native tropical milkweed shall not be planted in order to minimize the spread of the pathogen <i>Ophryocystis elektroscirra</i> (OE), and to encourage natural monarch migration. If possible, tropical milkweed shall be removed and replaced with native, insecticide-free nectar plants suitable for the location. 		
MM-BIO-2- Impacts on Monarch Butterflies	Even if the Project site does not support overwintering habitat, the Project Applicant shall avoid and minimize impacts on monarch butterflies by enhancing native, insecticide-free nectar sources; avoid planting any additional tropical milkweeds; and avoid using pesticides, insecticides, and soil fumigants.	During Project construction/ Over the Project's lifetime	City/Project Applicant

A3-24
CONT'D

2. Response to Comments

DocuSign Envelope ID: E5B4022E-FAC2-4596-ACB2-DAF69796138B

Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 14 of 17

MM-BIO-3- Impacts on Nesting Birds- Avoidance	To protect nesting birds and raptors that may occur on site or adjacent to the Project site, no construction should occur from February 15 (January 1 for raptors) through August 31.	Prior to Project construction	City/Project Applicant
MM-BIO-4- Impacts on Nesting Birds- Pre- Construction Surveys	If avoidance is not feasible, a qualified biologist shall complete a survey for nesting bird activity within a 500-foot radius of a construction site. Nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential nesting, roosting, and perch sites. Surveys shall be conducted no more than 7 days prior to the beginning of any activity likely to impact nesting birds and raptors. If Project activities are delayed or suspended for more than 7 days during the breeding season, surveys shall be repeated before activities can begin or restart.	Prior to/During Project construction	City/Project Applicant
MM-BIO-5- Impacts on Nesting Birds- Buffers	If nesting birds and/or raptors are identified, the following minimum no-disturbance buffers shall be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests, and 0.5 mile around active CESA or Endangered Species Act-listed bird nests. These buffers shall be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. These buffers shall be increased, if necessary, to protect the nesting birds.	Prior to/During Project construction	City/Project Applicant
MM-BIO-6- Impacts on Nesting Birds- Tree replacement	The Project Applicant shall compensate for the removal of any nesting habitat within the Project site. This shall include trees and the appropriate understory plantings. The Project Applicant shall provide at least 2 trees for each one removed or impacted. The number of replacement trees shall be higher for impacts on native trees, substantially large trees (e.g., heritage-sized trees), and trees with a dense canopy. The number of replacement trees shall be higher if the trees removed/impacted supports a California Species of Special Concern. The number shall increase even more with the occurrence of a CESA-listed species. The Project Applicant shall consult with CDFW to determine proper mitigation	Prior to/During Project construction	City/Project Applicant

A3-24
CONT'D

2. Response to Comments

DocuSign Envelope ID: E5B4022E-FAC2-4596-ACB2-DAF69796138B

Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 15 of 17

	for impacts to habitat supporting sensitive or special-status bird species.		
MM-BIO-7- Impacts on Bats- Survey	Where Project-related implementation, construction, and activities would occur near potential roosting habitat for bats, a qualified bat specialist shall conduct bat surveys within these areas (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. Acoustic recognition technology shall be used to maximize detection of bats. A survey report, including negative findings shall be provided to the City. Depending on the survey results, a qualified bat specialist shall discuss potentially significant effects of the Project on bats and provide species specific mitigation measures to reduce impacts to below a level of significance. Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist shall be completed and submitted to the City prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.	Prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats	City/Project Applicant
MM-BIO-8- Impacts on Bats- Tree removal	If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in trees at a given location, during tree removal, trees shall be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts shall not be bucked or mulched immediately. A period of at least 24 hours, and preferable 48 hours, shall elapse prior to such operations to allow bats to escape.	During tree removal	City/Project Applicant
MM-BIO-9- Impacts on	If maternity roosts are found, to the extent feasible, work shall be scheduled between October 1 and February 28, outside of the	Prior to Project construction	City/Project Applicant

A3-24
CONT'D

2. Response to Comments

DocuSign Envelope ID: E5B4022E-FAC2-4596-ACB2-DAF69796138B

Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 16 of 17

Bats- Maternity Roosts	maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to September 30).	if maternity roosts are found	
MM-BIO-10- Impacts on Bats- Maternity Roosts	If maternity roosts are found and impacts are unavoidable, a qualified bat specialist shall conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat. Acoustic recognition technology shall be used to maximize the detection of bats. Each tree identified as potentially supporting an active maternity roost shall be closely inspected by the bat specialist no more than 7 days prior to tree disturbance to determine the presence or absence of roost bats more precisely. If maternity roosts are detected, trees/structures determined to be maternity roosts shall be left in place until the end of the maternity season. Work should not occur within 100 feet of or directly under or adjacent to an active roost. Work shall also not occur between 30 minutes before sunset and 30 minutes after sunrise.	Prior to/During removal of trees or structures supporting maternity roosts	City/Project Applicant
REC-1- Additional Information and Resources	The City and Project Applicant should refer to the following resources for information on managing monarch overwintering habitat: <ul style="list-style-type: none"> • Western Monarch Butterfly Conservation Plan • Overwintering Site Management and Protection • Protecting California's Butterfly Groves • Managing Monarch Habitat in the West • Monarch Butterfly Nectar Plant Lists for Conservation Plantings • Tropical Milkweed • CDFW's Monarch Butterfly webpage page 	Prior to finalizing the CEQA document/ During Project construction/ Over the Project's lifetime	City/Project Applicant
REC-2-Impact Assessment (Monarchs)	The City should require the Project Applicant to retain a qualified biologist to conduct an overwintering grove habitat and impact assessment for the Project site. The qualified biologist should conduct season appropriate surveys to determine if the Project site supports overwintering groves/monarch population. The assessment should provide information on where overwintering	Prior to finalizing the CEQA document	City/Project Applicant

A3-24
CONT'D

2. Response to Comments

DocuSign Envelope ID: E5B4022E-FAC2-4596-ACB2-DAF69796138B

Ms. Anita Juhola-Garcia
City of Long Beach
August 2, 2021
Page 17 of 17

	habitat is located; what Project activities would impact overwintering habitat; what are the impacts (e.g., number and species of trees removed); where impacts would occur; and measures to avoid, minimize, or mitigate for those potential impacts.		
REC-3- Recirculate EIR	The City should recirculate the Project's environmental document after the habitat assessment to disclose information on monarch butterflies and potential overwintering habitat in the Project site; potential impacts on those biological resources; and measures to avoid, minimize, or mitigate for Project impacts.	Prior to finalizing the CEQA document	City
REC-4-Data	The City should ensure sensitive and special status species data has been properly submitted to the California Natural Diversity Database with all data fields applicable filled out. The City should require the Project Applicant to provide CDFW with a confirmation of data submittal.	Prior to adopting the Century Villages at Cabrillo Specific Plan.	City/Project Applicant
REC-5- Mitigation and Monitoring Reporting Plan	The City should update the Project's proposed Biological Resources Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter.	Prior to finalizing CEQA document	City

A3-24
CONT'D

2. Response to Comments

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2. Response to Comments

A3. Response to Comments from California Department of Fish and Wildlife, Erinn Wilson-Olgin Environmental Program Manager I dated August 2, 2021.

A3-1 The comment includes introductory statements concerning CDFW's role. No response is necessary.

A3-2 The comment includes introductory statements concerning the Project background and location. No response is necessary.

A3-3 The comment includes CDFW's statements concerning their comments and recommendations for the Project. No response is necessary.

A3-4 The comment includes CDFW's statements about how the Project may impact monarch butterfly and monarch butterfly overwintering habitat by removing vegetation and trimming trees. The comment states: "The Project site is located within 2.5 miles from the coast and two miles east of Banning Park and Museum. Banning Park is an overwintering site for monarchs (Western Monarch Count 2021)." However, there is no evidence that the site itself is an overwintering site, in fact no overwintering populations have previously been recorded onsite, and none were observed during a 2021 field survey. An updated monarch butterfly overwintering survey was undertaken during the period September 29 and October 14, 2021 by ELMT biologists Thomas J. McGill, Ph.D., and Travis J. McGill and no overwintering populations were observed. (See Monarch Butterfly Overwintering Survey, ELMT letter report dated November 22, 2021, Appendix A).

The comment further states monarch butterflies have been observed in the community garden, as well a second community garden located in the southeast corner of the Project site and in urban forest parallel to San Gabriel Avenue on the west side of the Project site. While monarchs have been observed on the site, no monarch butterfly overwintering populations have been identified on the site and none were observed onsite during the September 29 and October 14, 2021 field surveys. ELMT biologists Thomas J. McGill, Ph.D., and Travis J. McGill conducted the surveys between 0700 and 0900 when temperatures were low and monarch butterflies are typically clustered. The temperature during the surveys ranged from 53 to 62 degrees Fahrenheit and 52 to 58 degrees Fahrenheit, respectively, with initial cloud cover that rapidly cleared, and minimal winds. The surveys consisted of walking the entire Project site scanning the trees with binoculars looking for groves/populations of monarch butterflies. Specific attention was given to the urban forest on the western boundary of the Project site, that supports large eucalyptus trees and less development.

A3-5 The comment suggests: "If the Project site supports an overwintering grove/population of monarchs, CDFW recommends the City require the Project Applicant to protect, manage, enhance, and restore potential overwintering habitat on the Project site. The City should require the Project Applicant to prepare a long-term Monarch Butterfly Overwintering Habitat Management Plan in consultation with a qualified biologist."

2. Response to Comments

However, since no overwintering populations of monarch butterflies have been observed onsite as discussed above in Response A3-4, no further mitigation measures are recommended.

- A3-6 The comment suggests: “If the Project site does not support overwintering habitat, CDFW recommends the City require the Project Applicant to avoid and minimize impacts on monarch butterflies by enhancing native, insecticide-free nectar sources; avoid planting any additional tropical milkweeds; and avoid using pesticides, insecticides, and soil fumigants.” As noted in the response in A3-4, the Project site does not support overwintering monarch groves/populations. As discussed in the Initial Study (pages 39-42) the site is highly urbanized with ornamental trees. Pursuant to the provisions of the Specific Plan, existing trees onsite would be preserved when possible or replaced with a two to one ratio. (See Specific Plan.) Existing trees that are in a good or excellence condition can also be relocated if the new location is deemed appropriate by the accredited arborist or licensed landscape architecture. (Initial Study p. 41.) Impacts to existing trees onsite will be limited to the maximum extent possible, as it is the Project’s intent to retain the majority of the existing trees. As shown in Specific Plan Exhibit 6.9B, the Specific Plan calls for trees to be planted in the urban forest on the western boundary of the site. In addition, future landscape improvements within the Project site shall continue to using the plant palette with resilient, drought tolerant landscape, ideally plants that are native to California or to similar climates shall be used for planted areas. No further mitigation measures are recommended.
- A3-7 The comment includes a list of resources that CDFW recommends for managing monarch overwintering habitat. No response is necessary.
- A3-8 The comment recommends that “the City require the Project Applicant to retain a qualified biologist to conduct an overwintering grove habitat and impact assessment for the Project site.” As discussed in response A3-4, an additional survey was conducted (see Appendix A). No overwintering populations of monarch butterflies were observed onsite. Therefore, no impacts to overwintering groves/populations of monarch will occur from Project implementation. No further mitigation measures are recommended.
- A3-9 The comment recommends that “the City recirculate the Project’s environmental document after the habitat assessment to disclose information on monarch butterflies and potential overwintering habitat in the Project site; potential impacts on those biological resources; and measures to avoid, minimize, or mitigate for Project impacts.” As discussed in response A3-4, an additional habitat assessment was conducted and no monarch butterfly overwintering groves/populations were observed onsite (see Appendix A). As a result, no significant new information needs to be added to the EIR, and the EIR does not need to be recirculated.

2. Response to Comments

- A3-10 The comment states that “the Project site supports mature trees and provides canopy cover such as eucalyptus, pines, palms, and sycamores (*Platanus* genus). In the greater Los Angeles, urban forests and street trees, both native and some non-native species, provide habitat for a high diversity of birds (Wood and Esaian 2020).” The comment further states that “Project construction and activities could result in nest abandonment or decreased feeding frequency. This could result in increased nestling mortality thus significant impacts on nesting birds.” The comment includes CDFW’s statements and regulations regarding the protection of nesting birds and raptors, and states that no measures were provided in the Project’s environmental document to minimize or mitigate for potential impacts to nesting birds and raptors. As discussed in the Initial Study (pages 39-41) the site is highly urbanized with ornamental trees. There is no evidence that these trees serve as habitat for any migratory birds or raptors. (Initial Study, p. 40) Pursuant to the provisions of the Specific Plan, existing trees onsite would be preserved when possible or replaced with a two to one ratio (see Specific Plan). Existing trees that are in a good or excellent condition can also be relocated if the new location is deemed appropriate by the accredited arborist or licensed landscape architecture. (Initial Study, p. 41.) Impacts to existing trees onsite will be limited to the maximum extent possible, as it is the Project’s intent to retain the majority of the existing trees.
- A3-11 CDFW recommends that no construction should occur from February 15 (January 1 for raptors) through August 31. As discussed in Response A3-10, there is no evidence that existing ornamental trees serve as habitat for migratory birds or raptors. No impact is anticipated, and the recommended construction ban is unnecessary. However, the Project Applicant will implement the measure discussed below at Response A3-12, to ensure compliance with the Migratory Bird Treaty Act, which would fully mitigate any potential for nest disturbance.
- A3-12 The comment suggests that, “if avoidance is not feasible, a qualified biologist should complete a survey for nesting bird activity within a 500-foot radius of a construction site. Nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential nesting, roosting, and perch sites.” There is no evidence that the site serves as habitat for any migratory birds or raptors; however, in accordance with the Migratory Bird Treaty Act the Project will comply with the following regulatory requirement to ensure no impacts to nesting birds occur:
- BIO-1 All modifications to vegetation on onsite and offsite (public right-of-way) shall comply with the Migratory Bird Treaty Act (MBTA), including the completion of nesting bird surveys prior to any tree or vegetation removal:
- If initial clearing activities prior to the start of construction take place during the bird nesting season (February 15 through August 31, but variable based on seasonal and annual climatic conditions), a nesting bird survey should be performed by a qualified biologist within seven (7) days

2. Response to Comments

of such activities to determine the presence/absence, location, and status of any active nests on-site or within 300 feet for passerine and 500 feet for raptors of the site. The findings of the survey should be summarized in a report to be submitted to the City of Long Beach prior to undertaking construction activities at the site.

- If nesting birds are found on-site, a construction buffer of 500 feet for nesting raptors or threatened or endangered species and 100 feet of all other nesting birds should be implemented around the active nests and demarcated with fencing or flagging. Nests should be monitored at a minimum of once per week by the qualified biologist until it has been determined that the nest is no longer being used by either the young or adults. No ground disturbance should occur within this buffer until the qualified biologist confirms that the breeding/nesting is completed and all the young have fledged. If Project activities must occur within the buffer, they should be conducted at the discretion of the qualified biologist.
- If no nesting birds are observed during pre-construction surveys, no further actions would be necessary.

A3-13 The commenter provides a proposed mitigation measure that is addressed in response A3-12.

A3-14 The comment states that the temporary halt of Project activities within nesting buffers during the nesting season does not constitute effective mitigation for offsetting Project impacts associated with habitat loss and recommends compensation for the loss of trees.

The trees on the Project site, that have the potential to be removed, are ornamental trees associated with the existing development and are not native or constitute a native plant community. Pursuant to the provisions of the Specific Plan, existing trees onsite would be preserved when possible or replaced with a two to one ratio. No further mitigation measures are required.

A3-15 The comment includes CDFW's statements and regulations regarding the protection of roosting habitat for bats. The comment states that the Project may result in direct impacts on bats (injury and mortality) by removing trees and demolishing structures that may provide roosting habitat. No evidence is provided other than generalized statements about bat roosting characteristics. There is no evidence that bats are present on the Project site and no adverse impacts to bats are anticipated.

A3-16 The comment recommends mitigation including conducting bat surveys within areas with potential for bat roosting. However, as stated in response to comment A3-15, there is no evidence that bats are present on the Project site and no adverse impacts to bats are anticipated. No further mitigation measures are required.

2. Response to Comments

- A3-17 The commenter provides a proposed mitigation measures relating to bats that is addressed in response A3-16.
- A3-18 The commenter provides a proposed mitigation measures relating to bats that is addressed in response A3-16.
- A3-19 The commenter provides a proposed mitigation measures relating to bats that is addressed in response A3-16.
- A3-20 The comment includes a statement about ensuring special-status species are documented properly and included in the California Natural Diversity Database (CNDDDB).

As stated on Page 39 of the Initial Study (see Appendix A of the DEIR), the Project site is in a highly urbanized area of the City (see Figure 3, *Aerial Photograph*, of the DEIR) and nearly all of the Project site is developed with urban land uses. Sensitive animal and plant species have been identified within the Long Beach region, including species identified in the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB). This database lists special-status wildlife species that have historically occurred within regions of California, including Long Beach. It is important to note that the inclusion of species in the database does not mean that the listed species would occur within the Project site. The potential presence of a species is dependent on the type of habitat available. The CNDDDB indicates that nineteen rare plant species and thirteen sensitive, federally- and state-listed wildlife species have been identified in the Long Beach region (CDFW 2019). However, most of the species are presumed extirpated (rooted and destroyed) due to the highly urbanized state of the City.

The Project site does not support these species and habitat types due to fact that the Project site is currently built out and in a highly urbanized area. The Project site is surrounded by urban land uses and isolated from areas supporting suitable habitat for sensitive species. Therefore, impacts to the habitat of candidate, sensitive, or special status species would be less than significant upon implementation of the proposed Project and no further analysis is required.

- A3-21 The comment includes CDFW's recommendations for updating the MMRP for the environmental document based on the recommended mitigation measures suggesting in the above comments. Recommended Mitigation Measures provided in the MMRP include the following:

MM-BIO-1: refer to response A3-5

MM-BIO-2: refer to response A3-5

MM-BIO-3: refer to response A3-12

MM-BIO-4: refer to response A3-12

2. Response to Comments

MM-BIO-5: refer to response A3-12

MM-BIO-6: refer to response A3-12

MM-BIO-7: refer to response A3-16

MM-BIO-8: refer to response A3-16

MM-BIO-9: refer to response A3-16

MM-BIO-10: refer to response A3-16

REC-1-Additional Information and Resources: refer to response A3-7.

REC-2-Impact Assessment (Monarch): refer to response A3-4 and A3-8.

REC-3-Recirculate EIR: refer to response A3-9.

REC-4-Data: refer to response A3-20.

REC-5-MMRP: The Mitigation Monitoring and Reporting Program has been updated in accordance with responses provided herein (also refer to response A3-12 and A3-16).

A3-22 The comment includes a statement about CDFW's filing fees. The Project will pay all applicable CDFW filing fees. No response is necessary.

A3-23 The comment includes conclusionary statements. No response is necessary.

A3-24 The comment includes CDFW staff copied to the comment letter and references. No response is necessary.

The comment also provides a draft MMRP for the Project. The mitigation measures CDFW provides in the draft MMRP are discussed in A3-21.

2. Response to Comments


LETTER A4 – California Department of Transportation (2 pages)

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

DEPARTMENT OF TRANSPORTATION
DISTRICT 7 – Office of Regional Planning
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A4-1

Gavin Newsom, Governor



*Making Conservation
a California Way of Life.*

August 3, 2021

Anita Juhola-Garcia
City of Long Beach
411 W. Ocean Boulevard
Long Beach, CA 90802

RE: Century Villages at Cabrillo Specific Plan –
Draft Environmental Impact Report (DEIR)
SCH # 2020010387
GTS # 07-LA-2020-03625
Vic. LA-103/PM: 1.697

Dear Anita Juhola-Garcia:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The Project Applicant, Century Housing Corporation, is preparing the Century Villages at Cabrillo Specific Plan (Specific Plan) to redevelop portions of the existing Century Villages at Cabrillo. The Specific Plan is part of a collection of planning documents that will effectively guide the services, housing, amenities, and programming for the Plan Area, which encompasses 27 acres. Implementation of the Specific Plan would involve the removal of 235 dwelling units, 10,030 square feet of amenities, 10,200 square feet of education uses, 7,250 square feet of services and administrative uses, and 153 parking spaces. It would also entail the development of 750 dwelling units, 77,000 square feet of amenities, 15,000 square feet of educational uses, 17,000 square feet of commercial/retail uses, 48,000 square feet of administrative and supportive services, and 518 parking spaces. Buildout of the Plan Area would result in a total of 1,380 dwelling units, 79,350 square feet of amenities, 15,000 square feet of educational uses, 22,850 square feet of commercial/retail uses, 67,050 square feet of administrative and supportive services, and 877 parking spaces. The dwelling units will be 100% affordable, and located near a central transit center as well as dedicated bicycle and pedestrian facilities. The City of Long Beach is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located adjacent to State Route 103 (SR-103, also known as Terminal Island Freeway). Specifically, it is located adjacent to the section of SR-103 north of W 20th Street that the City of Long Beach owns and designates a Boulevard. Caltrans owns the rest of SR-103 south of W 20th Street, including the ramps at the San Gabriel Avenue & SR-103 NB Ramps/20th Street intersection. In addition, State Route 1 (SR-1, also known as the Pacific Coast Highway) is located approximately 625 feet away from the project and Interstate 710 (I-710) is located approximately 5,000 feet away from the project. From reviewing the DEIR, Caltrans has the following comments.

Since Caltrans commented on the Notice of Preparation for this project, the implementation deadline for Senate Bill 743 (2013) has passed. Thus, we have reviewed this DEIR primarily from a Vehicle Miles Traveled (VMT) perspective. The DEIR states "the Specific Plan would have a less than significant VMT impact due to its location within a transit priority area and the Specific Plan being a 100 percent affordable housing project with neighborhood-serving retail less than 50,000 sf in area." We concur with this assessment. We also support this project's implementation of Transportation Demand Management measures, such as employee flexible work programs, subsidized transit passes, and carpool/carshare

*"Provide a safe and reliable transportation network that serves all people
and respects the environment."*

2. Response to Comments

Anita Juhola-Garcia
August 3, 2021
Page 2 of 2

programs. These measures will further reduce this project's VMT impacts and Greenhouse Gas emissions, which aligns with Caltrans' mission to provide a safe and reliable transportation network that serves all people and respects the environment. A4-2
CONT'D

In addition, the DEIR lists Caltrans as a Responsible Agency and states that approval from us will be necessary for any improvements to or work conducted in Caltrans right of way, including SR-103. The DEIR also states that Caltrans encroachment permits might be necessary. We concur with and appreciate these statements. Note that the encroachment permit process is handled by Caltrans' Office of Permits. For more information on encroachment permits, see: <https://dot.ca.gov/programs/traffic-operations/ep>. A4-3

Before approaching the Office of Permits about improvements near SR-103, we recommend that the City of Long Beach send Caltrans a feasibility study for the "Potential Gateway Extension" shown in Figure 3-7 of the DEIR. It appears from the figure that Williams Street will be extended to SR-103. While the City of Long Beach owns this section of SR-103, this extension could still impact the section of SR-103 that Caltrans owns. To ensure that this extension does not negatively impact the section of SR-103 that Caltrans owns, and that the permitting process is completed as quickly and smoothly as possible, Caltrans recommends that the City send us the feasibility study for this extension as soon as it is available.

The DEIR also states in the Non-CEQA analysis section that a "corrective action" was explored to improve the Level of Service (LOS) at the intersection of Harbor Avenue and PCH, because it is projected to operate at LOS E under both the Baseline Plus Project and Future Plus Project scenarios. This action would be to stripe a dedicated northbound right-turn lane at this intersection. Caltrans concurs that there would be adequate width to stripe a right-turn only lane at this intersection, as the current shared through-right lane is 22 feet wide. If a dedicated right-turn lane will be installed, Caltrans recommends that approximately 80 feet of street parking be removed to provide enough storage length. A standard dedicated right-turn lane is 12 feet wide with a 4-foot bike buffer. If the new lane deviates from these standards, a Design Standard Decision Document (DSDD) will be needed. Also, this improvement will likely need an encroachment permit as well. A4-4

The following information is included for your consideration. Any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review. A4-5

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2020-03625.

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

*"Provide a safe and reliable transportation network that serves all people
and respects the environment."*

2. Response to Comments

A4. Response to Comments from California Department of Transportation, Miya Edmonson, IGR/CEQA Branch Chief, dated August 3, 2021.

- A4-1 The commenter provides a summary of the Project and the access and circulation components serving and surrounding the Project site, which are contained in detail in Chapters 3, *Project Description*, and 4, *Environmental Setting*, of the Draft Environmental Impact Report (DEIR). The comment is noted and no response is necessary.
- A4-2 The commenter states that they concur with the assessment and finding in the DEIR regarding vehicle miles traveled (VMT). Specifically, with the conclusion that the Project would have a less than significant VMT impact. The commenter also noted their support of the Project's implementation of Transportation Demand Management measures and how these measures will further reduce the Project's VMT impacts and greenhouse gas emissions, which aligns with Caltrans' mission to provide a safe and reliable transportation network that serves all people and respects the environment. The comment is noted and no response is necessary.
- A4-3 The commenter concurred with and appreciated the statements provided in the DEIR, which includes listing Caltrans as a responsible agency and states that approval from Caltrans will be necessary for any improvements to or work conducted in Caltrans right-of-way. The commenter also noted that the encroachment permit process is handled by Caltrans' Office of Permits. The comment is noted. If any work is proposed within Caltrans' right-of-way, the City will ensure through its development review process that the Project Applicant obtain any and all necessary permits from Caltrans for work within the right-of-way.
- A4-4 The commenter commented on the non-CEQA transportation analysis provided in the Transportation Impact Study, which is included as Appendix J to the DEIR. Specifically, Caltrans concurs with the on the level of services (LOS) analysis conducted for the Harbor Avenue and Pacific Coast Highway intersection and the conclusion that improvements are required to this intersection due to Project traffic added to the intersection under the Baseline Plus Project and Future Plus Project scenarios. Caltrans concurred that there would be adequate width to stripe a right-turn only lane at this intersection, as the current shared through-right lane is 22 feet wide. If a dedicated right-turn lane will be installed, Caltrans recommends that approximately 80 feet of street parking be removed to provide enough storage length. The commenter also states that a standard dedicated right-turn lane is 12 feet wide with a 4-foot bike buffer. If the new lane deviates from these standards, a Design Standard Decision Document will be required to be submitted to Caltrans. The commenter also notes that improvements at this intersection will likely need an encroachment permit. The comment is noted. Through its development review process, the City will coordinate with Caltrans to ensure that all improvements at this intersection, once they are proposed, are provided in accordance with all Long Beach and Caltrans' standards.

2. Response to Comments

- A4-5 The commenter provides information regarding the transportation of heavy construction equipment and/or materials that requires use of oversized-transport vehicles on state highways and these activities requiring a Caltrans transportation permit. Caltrans also recommended that the Project limit construction traffic to off-peak periods to minimize the potential impact on state facilities. If at anytime it is determined that such equipment and permits are required, the Project Applicant will submit the necessary plans and permit applications to Caltrans for review and approval; this will be ensured through the City of Long Beach development review process. Also, and to the extent possible, the Project Applicant will limit construction traffic to off-peak periods to minimize the potential impact on state facilities.

3. Revisions to the Draft EIR

3.1 INTRODUCTION

This section contains revisions to the DEIR based on (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of DEIR publication; and/or (3) typographical errors. This section also includes an additional mitigation measure to fully respond to commenter concerns as well as provide additional clarification to mitigation requirements included in the DEIR. The provision of this additional mitigation measures does not alter any impact significance conclusions as disclosed in the DEIR. Changes made to the DEIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions.

3.2 DEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments received on the DEIR.

Page 3-29, Chapter 3, *Project Description*. The following text is modified in response to Comments A1-1 and A1-2 from the City of Long Beach Energy Resources Department.

Dry Utilities Plan

The Plan Area is in the service area of Southern California Edison and will continue to be served by the existing electrical transmission lines in and around the Plan Area. Natural gas will continue to be provided by the City of Long Beach Energy Resources Department, while telecommunication services will continue to be provided by Frontier Communications. All new electrical, natural gas, and telecommunication utility infrastructure will be located in underground conduits and vaults or placed in enclosed spaces (e.g., utility closets). Service providers will be consulted to ensure all utilities will be properly installed and adequate to serve future development accommodated by the Specific Plan.

Page 4-8, Chapter 4, *Environmental Setting*. The following text is modified in response to Comments A1-1 and A1-3 from the City of Long Beach Energy Resources Department.

4.3.8 Public Services and Utilities

Public services and utilities are provided to the Plan Area by entities listed in Table 4-2.

Table 4-2 Public Service and Utility Providers

Public Services	
Police	Long Beach Police Department
Fire Protection and Emergency Medical Services	Long Beach Fire Department

3. Revisions to the Draft EIR

Table 4-2 Public Service and Utility Providers

Public Schools	Long Beach Unified School District
Library	Long Beach Public Library
Parks	City of Long Beach Parks, Recreation, and Marine Department
Utilities	
Water	Long Beach Water Department
Wastewater Collection	Long Beach Water Department
Wastewater Treatment	Sanitation Districts of Los Angeles County
Solid Waste Collection	City of Long Beach Public Works Department, Environmental Services Bureau
Solid Waste Disposal (Landfills)	Sanitation Districts of Los Angeles County
Electricity	Southern California Edison
Natural Gas	<u>City of Long Beach Energy Resources Department</u>

Page 5.4-1, Section 5.4, *Energy*. The following text is modified in response to Comments A1-1 and A1-4 from the City of Long Beach Energy Resources Department.

5.4 ENERGY

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for energy-related impacts associated with the Villages at Cabrillo Specific Plan (Specific Plan) and ways in which the Specific Plan would reduce unnecessary energy consumption, consistent with the suggestions contained in Appendix F of the CEQA Guidelines. Energy service providers to the Plan Area include Southern California Edison (SCE) for electrical service and ~~Southern California Gas Company (SoCalGas)~~ the City of Long Beach Energy Resources Department for natural gas. Modeling of energy data is included in Appendix C of this DEIR.

Pages 5.4-7 and 5.4-8, Section 5.4, *Energy*. The following text is modified in response to Comments A1-1 and A1-5 from the City of Long Beach Energy Resources Department.

Natural Gas

Serving approximately 150,000 customers, the City of Long Beach Energy Resources Department (LBERD) is the largest California municipal gas utility and the fifth largest municipal gas utility in the United States. LBERD's service territory includes the cities of Long Beach and Signal Hill, and sections of surrounding communities including Lakewood, Bellflower, Compton, Seal Beach, Paramount, and Los Alamitos.

Long Beach receives a small amount of its gas supply directly into its pipeline system from local production fields that are located within the City's service territory, as well as offshore. Currently, the City receives approximately five percent of its gas supply from local production. The majority of the City's supplies are purchased at the California border, primarily from the Southwestern United States. The City, as a wholesale customer, receives intrastate transmission service for this gas from ~~SoCalGas~~ LBERD.

3. Revisions to the Draft EIR

~~SoCalGas provides gas service in the City and has facilities throughout the City, including the Plan Area. The service area of SoCalGas spans much of the southern half of California, from San Luis Obispo County in the northwest to part of Fresno County in the north to Riverside County and most of San Bernardino County in the east to Imperial County in the southeast (CEC 2015b). Total natural gas supplies available to SoCalGas for years 2018 and 2019 are 3,055 million cubic feet per day (MMcf/day) and 3,385 MMcf/day, respectively (CGEU 2018). Total natural gas consumption in SoCalGas's service area was 722,247 MMcf for 2018, which is equivalent to 1,979 MMcf/day (CEC 2020b).~~

Page 5.4-13, Section 5.4, *Energy*. The following text is modified in response to Comments A1-1 and A1-6 from the City of Long Beach Energy Resources Department.

Natural Gas

As shown in Table 5.4-3, implementation of the Specific Plan would result in a net increase in natural gas demand by 9,202,316 kBTU/year compared to the existing uses. The City of Long Beach ~~Gas and Oil~~ Energy Resources Department forecasts that its natural gas supplies will increase by approximately 1 MMCF/day between 2019 and 2035. That amounts to an increase of 370 million kBTU (CGEU 2016). The forecast net increase in natural gas demands due to buildout under the Specific Plan is well within City forecasts of natural gas supplies, and therefore, would not require the City to obtain new or expanded natural gas supplies.

Page 5.16-2, Section 5.16, *Utilities and Service Systems*. The following text is modified in response to Comment A2-2 from the Los Angeles County Sanitation Districts.

~~Long Beach Water Reclamation Plant Joint Water Pollution Control Plant~~ NPDES Permit

Wastewater discharge requirements for the ~~Long Beach Reclamation Plant~~ Joint Water Pollution Control Plant (JWPCP) are detailed in NPDES No. ~~CA0054119~~ CA0053813, Order No. ~~R4-2003-0123~~ R4-2017-0180. The permit includes the conditions needed to meet minimum applicable technology-based requirements. The permit includes limitations more stringent than applicable federal technology-based requirements where necessary to achieve the required water quality standards.

Page 5.16-3, Section 5.16, *Utilities and Service Systems*. The following text is modified in response to Comments A2-2 and A2-3 from the Los Angeles County Sanitation Districts.

Wastewater Conveyance

LBWD owns, operates, and maintains over 700 miles of sanitary sewer lines and delivers over 40 million gallons of wastewater per day to the ~~Long Beach Water Reclamation Plant (WRP)~~ JWPCP (LBWD 2019b).

The LBWD's sanitary sewer system comprises of:

- 712 miles of gravity mains
- 7.6 miles of force mains (2-inch to 12-inch diameter)

3. Revisions to the Draft EIR

- 28 sewer lift stations
- 115,133 lateral connections
- 16,158 sewer maintenance manholes (LBWD 2019a)

The Plan Area's existing sewer infrastructure was constructed in the 1960's and consists of two private sanitary sewer main lines which tie into a public point of connection (POC) along Technology Place. Each private main line separately branches off to buildings serving the West and East portions of the campus. Based on available record data provided by the LBWD, the sewer main connected to the public POC West of River Avenue is a 10-inch vitrified clay pipe (VCP) and has a calculated capacity of 0.300 cubic feet per second (cfs) (193,895 gallons per day (gpd)). The sewer mains connected to the public POC East of River Avenue are two 8-inch VCPs with a total calculated capacity of 0.864 cfs (558,418 gpd) (KPFF 2020b).

The wastewater flow originating from the Project site discharges to the aforementioned local sewer lines, which are not maintained by LACSD, for conveyance to LACSD's Pico Avenue Trunk Sewer located in Fashion Avenue at the alleyway south of 12th Street. LACSD's 36-inch diameter trunk sewer has a capacity of 15 million gallons per day (mgd) and conveyed a peak flow of 6.7 mgd when last measured in 2018 (LACSD 2021).

Page 5.16-4, Section 5.16, *Utilities and Service Systems*. The following text is modified in response to Comments A2-2 and A2-4 from the Los Angeles County Sanitation Districts.

Wastewater Treatment

~~The WRP JWPCP is located at 7400 East Willow Street in the City in the City of Carson and is owned and operated by the LACSD. The plant occupies 17 acres west of Interstate 605 south of Katella Avenue, and began operation in 1973. The WRP provides primary, secondary and tertiary treatment and serves a population of approximately 250,000 people. The JWPCP is a state-of-the-art wastewater treatment facility serving over 3.5 million residents and thousands of businesses and industries in Los Angeles County. The WRP treats about 48 million gallons currently JWPCP processes an average flow of 259.6 million gallons of wastewater per day, though it has the capacity to treat up to 25 400 million gallons of wastewater per day (LBWD 2019b, 2019e LACSD 2021).~~

Page 5.16-5, Section 5.16, *Utilities and Service Systems*. The following text is modified in response to Comments A2-1, A2-2 and A2-4 from the Los Angeles County Sanitation Districts.

Wastewater Conveyance

Wastewater generation would not occur during the construction phase of the Specific Plan as a result of construction workers on-site. Construction workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from construction activities is not anticipated to cause any increase in wastewater flows, and no impact would occur.

3. Revisions to the Draft EIR

Based on the type of use and generation factors, the Specific Plan would generate a net increase of approximately ~~0.12~~ 0.16 cfs (~~79,280~~ 105,021 gpd) of wastewater in which ~~0.08~~ 0.11 cfs (~~53,455~~ 73,033 gpd) is collected from the West private main line and ~~0.04~~ 0.05 cfs (~~25,825~~ 34,254 gpd) from the East private main line (KPPF 2019a).

The existing capacity of the 10-inch sewer main at the public POC West of River Ave is approximately 0.300 cfs at 50% full and the existing capacity of the two 8-inch sewer mains connected to the public POC's East of River Ave is approximately 0.864 cfs at 50% full; 50% full, also known as 50% depth over diameter, is the local agency requirement for sewer pipe capacity. These sewer mains serve only the Plan Area since the Plan Area is the most upstream development on this particular public system.

At full buildout of the Specific Plan, the private sewer main line in the West portion of the campus will contribute a net increase of approximately ~~0.08~~ 0.11 cfs of sewage into the public sewer system West of River Avenue, which results in approximately ~~27%~~ 37% of the pipe's capacity at 50% full. Similarly, at full buildout of the Specific Plan, the private sewer main line in the East portion of the campus will contribute a net increase of approximately ~~0.04~~ 0.05 cfs of sewage into the public sewer system East of River Avenue, which results in approximately ~~5%~~ 6% of the pipe's capacity at 50% full. Since sewer generation associated with implementation of the Specific Plan would be within the available sewer infrastructure capacity, it would not require the construction of new or expanded sewer lines, and impacts on wastewater infrastructure would be less than significant.

Wastewater Treatment

The Specific Plan would generate a net increase of ~~79,280~~ 105,021 gpd of sewer that needs to be treated at the ~~WRP JWPCP~~, which has a residual capacity of 7 ~~approximately 140~~ million gpd. Therefore, the Specific Plan will contribute an increased sewage flow equivalent to ~~approximately less than~~ 1% of ~~WRP's JWPCP's~~ residual capacity; impacts would be less than significant.

The ~~WRP JWPCP~~ is required by federal and state law to meet applicable standards of treatment plant discharge requirements subject to NPDES NO. ~~CA0054119~~ CA0053813, Order No. ~~R4-2003-0123~~ R4-2017-0180. The permit includes the conditions needed to meet minimum applicable technology-based requirements. The NPDES permit regulates the amount and type of pollutants that the system can discharge into receiving waters. The ~~WRP JWPCP~~ is operating in compliance with and would continue to operate subject to state waste discharge requirements and federal NPDES permit requirements, as set forth in the NPDES permit and order. Furthermore, the Specific Plan will comply with the LBWD's Rules, Regulations, and Charges.

The additional wastewater (quantity and type) that would be generated by the Specific Plan and treated by the ~~WRP JWPCP~~ would not impede the treatment plant's ability to continue to meet its wastewater treatment requirements. Impacts on wastewater treatment would be less than significant.

3. Revisions to the Draft EIR

Page 5.16-6, Section 5.16, *Utilities and Service Systems*. The following text is modified in response to Comment A2-2 from the Los Angeles County Sanitation Districts.

5.16.1.4 CUMULATIVE IMPACTS

The area considered for cumulative impacts to wastewater treatment is the ~~WRP's~~ JWPCP's service area. The area considered for cumulative impacts to wastewater conveyance systems is the LBWD's service area.

Future growth in the City would result in increases in wastewater flow. These include increases in residential, commercial, and industrial effluent. The City's SSMP projects daily wastewater generation in line with land use changes associated with the General Plan. Sewer collection system expansions and upgrades would be based on the SSMP. Through the use of connection fees and agreements, LBWD is able to maintain and expand its wastewater collection system as necessary and is able to ensure that new developments pay their fair-share costs associated with increased demand. Therefore, there would be no significant cumulative impacts on wastewater collection.

The City's wastewater effluent is directed to ~~WRP~~ JWPCP operated by LACSD. Future development in the City would comply with the LBWD's Rules, Regulations, and Charges to ensure that the ~~WRP~~ JWPCP continues to operate in compliance with its NPDES permit. Furthermore, future development would also comply with the requirements of the LACSD's Connection Fee Program to fund future capital improvement programs. Accordingly, cumulative impacts on wastewater infrastructure and treatment would be less than significant.

Page 5.16-10, Section 5.16, *Utilities and Service Systems*. The following text is modified in response to Comment A2-2 from the Los Angeles County Sanitation Districts.

Water Supply

LBWD provides water service to residents, businesses, and other users in the City, including the Plan Area. As of 2017, the LBWD's service area encompassed approximately 50 square miles and a population of 480,173, with some customers outside the City limits (LBWD 2017b). The primary source of water is groundwater extracted locally from the Central Basin. Other water supplies include purchased imported water from the Metropolitan Water District (MWD) and recycled water from the ~~Long Beach WRP~~ JWPCP.

Page 5.16-28, Section 5.16, *Utilities and Service Systems*. The following text is modified in response to Comments A1-1 and A1-9 from the City of Long Beach Energy Resources Department.

Existing Conditions

The Plan Area is within the service area of Southern California Edison (SCE) and would be served by the existing electrical transmission lines. Gas would be provided by the City of Long Beach Energy Resources Department (LBERD). All dry utility connections within the Plan Area would be located within underground conduits and vaults.

3. Revisions to the Draft EIR

Page 5.16-29, Section 5.16, *Utilities and Service Systems*. The following text is modified in response to Comment A1-1 from the City of Long Beach Energy Resources Department.

Natural Gas

Serving approximately 150,000 customers, LBERD is the largest California municipal gas utility and the fifth largest municipal gas utility in the United States. LBERD's service territory includes the cities of Long Beach and Signal Hill, and sections of surrounding communities including Lakewood, Bellflower, Compton, Seal Beach, Paramount, and Los Alamitos.

Long Beach receives a small amount of its gas supply directly into its pipeline system from local production fields that are located within the City's service territory, as well as offshore. Currently, the City receives approximately five percent of its gas supply from local production. The majority of the City's supplies are purchased at the California border, primarily from the Southwestern United States. The City, as a wholesale customer, receives intrastate transmission service for this gas from ~~SoCalGas~~ LBERD.

~~SoCalGas provides gas service in the City and has facilities throughout the City, including the Plan Area. The service area of SoCalGas spans much of the southern half of California, from San Luis Obispo County in the northwest to part of Fresno County in the north to Riverside County and most of San Bernardino County in the east to Imperial County in the southeast (CEC 2015b). Total natural gas supplies available to SoCalGas for years 2018 and 2019 are 3,055 million cubic feet per day (MMcf/day) and 3,385 MMcf/day, respectively (CGEU 2018). Total natural gas consumption in SoCalGas's service area was 722,247 MMcf for 2018, which is equivalent to 1,979 MMcf/day (CEC 2020b).~~

Existing natural gas demands for the Plan Area is estimated at 9,900,123 kilo-British thermal units per year (kBTU/yr).

Page 5.16-31, Section 5.16, *Utilities and Service Systems*. The following text is modified in response to Comments A1-1 and A1-10 from the City of Long Beach Energy Resources Department.

Natural Gas

Specific Plan operation is estimated to result in a net increase of about 9.2 million kilo British Thermal Units (kBTU) per year at buildout. ~~The City of Long Beach Gas and Oil Department~~ City of Long Beach Energy Resources Department forecasts that its natural gas supplies will increase by approximately 1 MMCF/day between 2019 and 2035. That amounts to an increase of 370 million kBTU (CGEU 2016). The forecast net increase in natural gas demands due to buildout under the Specific Plan is well within City forecasts of natural gas supplies, and therefore, would not require the City to obtain new or expanded natural gas supplies.

Furthermore, the Specific Plan would comply with the requirements of the current California Building Energy and Efficiency Standards and CALGreen. All new appliances would comply with the 2012 Appliance Efficiency Regulations.

Level of Significance Before Mitigation: Less than Significant.

3. Revisions to the Draft EIR

3.2.1.2 CUMULATIVE IMPACTS

The area considered for cumulative impacts to electricity supplies and facilities is SCE's service area, and the area considered for natural gas is ~~Long Beach Gas and Oil Department's~~ the City of Long Beach Energy Resources Department service area. Forecast total electricity and natural gas supplies for the service areas are identified above. Other projects would increase electricity and natural gas demands.

Mitigation Monitoring and Reporting Program. The following regulatory requirement has been added to the Mitigation Monitoring and Reporting Program in response to Comment A3-12 from California Department of Fish and Wildlife.

BIO-1 All modifications to vegetation on onsite and offsite (public right-of-way) shall comply with the Migratory Bird Treaty Act (MBTA), including the completion of nesting bird surveys prior to any tree or vegetation removal:

- If initial clearing activities prior to the start of construction take place during the bird nesting season (February 15 through August 31, but variable based on seasonal and annual climatic conditions), a nesting bird survey should be performed by a qualified biologist within seven (7) days of such activities to determine the presence/absence, location, and status of any active nests on-site or within 300 feet for passerine and 500 feet for raptors of the site. The findings of the survey should be summarized in a report to be submitted to the City of Long Beach prior to undertaking construction activities at the site.
- If nesting birds are found on-site, a construction buffer of 500 feet for nesting raptors or threatened or endangered species and 100 feet of all other nesting birds should be implemented around the active nests and demarcated with fencing or flagging. Nests should be monitored at a minimum of once per week by the qualified biologist until it has been determined that the nest is no longer being used by either the young or adults. No ground disturbance should occur within this buffer until the qualified biologist confirms that the breeding/nesting is completed and all the young have fledged. If Project activities must occur within the buffer, they should be conducted at the discretion of the qualified biologist.
- If no nesting birds are observed during pre-construction surveys, no further actions would be necessary.

Appendix

Appendix A. Monarch Butterfly Overwintering Survey

Appendix

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November 22, 2021

CENTURY VILLAGES AT CABRILLO
2001 River Avenue
Long Beach, California 90810

SUBJECT: Monarch Butterfly (*Danaus plexippus* population 1 – California overwintering population) Overwintering Survey

Introduction

ELMT Consulting (ELMT) is pleased to submit this report documenting the results of a monarch butterfly overwintering survey conducted for the Century Villages at Cabrillo project located in the City of Long Beach, Los Angeles County, California. The survey was conducted to document the absence of monarch butterfly overwintering populations from the project site.

Project Location

The project site is generally located south of Interstate 405, west of Interstate 710, north of State Route 1 and east of Interstate 110 in the City of Long Beach, Los Angeles County, California. The project site is depicted on the Long Beach quadrangle of the United States Geological Survey's (USGS) 7.5-minute map series within an unsectioned portion of Township 3 South, Range 12 West. Specifically, the site is bordered by W. 20th Street along its southern boundary, State Route 103 (Terminal Island Freeway) along its western boundary, W. Willard Street along its northern boundary, and Monitor Avenue along its eastern boundary.

Project Description

The Project proposes to redevelop portions of a former 27-acre U.S. Naval housing facility over 10 years beginning in 2023. The Project site has undergone redevelopment since 2011, which included creation of new housing, streets, and parking. The Project would transition the collection of antiquated structures and underutilized areas to modern affordable housing and service facilities along with key site improvements. The Project would demolish 235 dwelling units; 10,030 square feet of amenities; 10,200 square feet of educational uses; 7,250 square feet of administrative and support services; and removal of 153 parking spaces. New development under the Project will include 750 dwelling units; 77,000 square feet of amenities; 15,000 square feet of educational uses; 17,000 square feet of commercial/retail uses; 48,000 square feet of administrative and supportive services; and 518 parking spaces.

Methodology

ELMT biologists Thomas J. McGill, Ph.D., and Travis J. McGill conducted field surveys on September 29 and October 14, 2021. The surveys consisted of walking the entire project site scanning the trees with binoculars looking for groves/populations of monarch butterflies. Specific attention was given to the urban forest on the western boundary of the project site, that supports large eucalyptus trees and less development

Background

Monarch butterflies have an annual, multigenerational, migratory life cycle. Each monarch generation begins with eggs laid on milkweed (*Asclepias* spp.). Each fall, millions of monarch butterflies east of the Rocky Mountains migrate from as far north as Canada to the central Mexican State of Michoacán. There, butterflies overwinter in dense clusters, blanketing oyamel fir trees in mountainous forest preserves. In the spring, clusters disperse and monarch butterflies mate and migrate northward into the southern US. This first wave of monarchs lays eggs on milkweed plants and after completing its development from caterpillar to adult, the next generation continues the journey north, seeking milkweed. This northward, generational voyage continues until a fourth generation emerges as far north as southern Canada in the late summer. Shortening days and other cues indicate that the summer is coming to an end. Rather than mating, this fourth generation enters a state of reproductive diapause and migrates south all the way to central Mexico. Along the ~2500 mile trip, migrating monarchs feed on nectar to build fat reserves that will sustain them during the winter months in Mexico. West of the Rocky Mountains, monarch butterflies overwinter in groves along the Pacific coast in California. In the spring, monarchs disperse and subsequent generations populate regions to the north, east and south.

Overwintering habitat is comprised of a grove of trees that produce the necessary microclimate for monarch survival. The majority of sites are located within 1.5 miles from the Pacific Ocean (Leong et al. 2004), where these water bodies moderate temperature fluctuations (Chaplin and Wells 1982). Suitable grove conditions include temperatures above freezing, high humidity, dappled sunlight, access to water and nectar, and protection from high winds and storms. Although non-native eucalyptus (*Eucalyptus* spp.) trees dominate most coastal California and Baja overwintering sites, monarchs will select the native Monterey pine (*Pinus radiata*), Monterey cypress (*Cupressus macrocarpa*), western sycamore (*Platanus racemosa*), and other native tree species when they are available (Griffiths and Villablanca 2015; Xerces 2018a).

Site Conditions

The project site supports an existing residential community that provides supportive housing and social services. The existing campus includes short-term and permanent housing; centers for substance abuse treatment, childcare, and other services; and extensive landscaping, including therapeutic and edible gardens.

Survey Results

Despite a systematic, 100% visual search of the ornamental/landscaped trees on the project site, no monarch butterfly overwintering groves/populations were observed onsite during the September 29 and October 14, 2021 field surveys. The surveys were conducted between 0700 and 0900 when temperatures were low and monarch butterflies are typically clustered. The temperature during the surveys ranged from 53 to 62 degrees Fahrenheit and 52 to 58 degrees Fahrenheit, respectively, with initial cloud cover that rapidly cleared, and minimal winds.

Conclusion

Since no overwintering populations of monarch butterflies were observed onsite, no further mitigation measures are recommended.

Please do not hesitate to contact Tom McGill at (951) 285-6014 or tmcgill@elmtconsulting.com or Travis McGill at (909) 816-1646 or travismcgill@elmtconsulting.com should you have any questions this report.

Sincerely,



Thomas J. McGill, Ph.D.
Managing Director



Travis J. McGill
Director

References

Chaplin, S., and P. Wells. 1982. Energy reserves and metabolic expenditures of monarch butterflies overwintering in southern California. *Ecological Entomology* 7:249–256.

Griffiths, J., and F. Villablanca. 2015. Managing monarch butterfly overwintering groves: making room among the eucalyptus. *California Fish and Game* 101(1):40– 50.

Leong, K. L. H., W. H. Sakai, W. Bremer, D. Feuerstein, and G. Yoshimura. 2004. Analysis of the pattern of distribution and abundance of monarch overwintering sites along the California coastline. Pages 177–185 *in* K. S. Oberhauser and M. J. Solensky, editors. *Monarch Butterfly: Biology and Conservation*. Cornell University Press, Ithaca, New York, USA.

USFWS. Introduction to Monitoring for Monarch Conservation.