

COMMENTS AND RESPONSES TO COMMENTS

This chapter of the Final Supplemental EIR contains the comment letters received during the public review period for the Draft Supplemental EIR, which concluded on June 19, 2020. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared to address comments on significant environmental issues received from reviewers of the Draft Supplemental EIR.

COMMENTERS ON THE DRAFT SUPPLEMENTAL EIR

Table RTC-1 lists the comment letters received on the Draft Supplemental EIR. The comments and associated responses are provided in the order in which they were received by CSULB.

Table RTC-1
List of Commenters

Letter Number	Agency/Organization	Date	Page # of Response
State			
1	California Department of Transportation <i>Signed: Miya Edmonson</i> <i>IGR/CEQA Branch Chief</i>	May 28, 2020	RTC-4
Local/Regional			
2	Juaneño Band of Mission Indians, Acjachemen Nation <i>Signed: Joyce Perry</i> <i>Payomkawichum Kaamalam, President</i> <i>Juaneño Band of Mission Indians, Acjachemen Nation</i> <i>Tribal Manager, Cultural Resource Director</i>	June 3, 2020	RTC-6
3	City of Long Beach Development Services, Planning Bureau <i>Signed: Linda Tatum, FAICP</i> <i>Director of Development Services</i>	June 11, 2020	RTC-8
4	Long Beach Heritage <i>Signed: Cheryl Perry, President</i>	June 19, 2020	RTC-11
5	Los Angeles Conservancy <i>Signed: Adrian Scott Fine, Director of Advocacy</i>	June 19, 2020	RTC-20
6	Los Angeles County Sanitation Districts <i>Signed: Adriana Raza, Customer Service Specialist,</i> <i>Facilities Planning Department</i>	June 19, 2020	RTC-22

COMMENTS AND RESPONSES ON THE DRAFT SUPPLEMENTAL EIR

The written comments received on the Draft Supplemental EIR and the responses to those comments are presented below. Each comment letter has been assigned a number code, and individual comments in each letter have also been coded to facilitate responses. For example, the letter from the California Department of Transportation is identified as Comment Letter 1, with comments noted as 1-1, 1-2, etc. Copies of each comment letter are provided prior to each response.

Comment Letter No. 1

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life.

May 28, 2020

Martin Grant, Program Manager, Capital Construction
California State University, Long Beach
Office of Design + Construction Services
1331 Palo Verde Avenue, MS#5805
Long Beach, California 90815

RE: Housing Expansion Phase 1 – Housing
Administration and Commons Building
Project – Draft Supplemental Environmental
Impact Report (SEIR)
SCH# 2007061092
GTS# 07-LA-2020-03250
Vic. LA-10 PM 2.709

Dear Martin Grant,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project would demolish the existing 5,700-square-foot (SF) Hillside Office/Commons building and construct two new buildings in its place: a two-story, 8,000-SF commons building and a single-story, 4,500-SF HRL office building. Five one- and two-bedroom apartments and an outdoor terrace would be provided on the second floor of the proposed commons building to replace and augment two one-bedroom apartments that would be lost to demolition of the existing Hillside Office/Commons building. Following construction, the project would generally serve the same function as the existing Hillside Office/Commons building currently does, providing office space and a location for students to study and lounge. The Earl Warren Drive median in front of the existing Hillside Office/Commons building would be removed to accommodate the proposed building footprints. Additionally, the existing northern and southern medians would be shortened. Changes to parking would not occur and project operation is not expected to generate additional vehicle trips since the buildings would serve existing students.

1-1

The nearest State facility to the proposed project site is SR 22. After reviewing the DSEIR, Caltrans does not anticipate any significant adverse impacts to the State Highway System.

1-2

Please note that the transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will also need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

1-3

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

Martin Grant
May 28, 2020
Page 2

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-03250.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

Comment Letter 1: California Department of Transportation

Response 1-1

This comment accurately characterizes the proposed project described in the Draft Supplemental EIR. This comment includes introductory remarks and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft Supplemental EIR. Therefore, no further response to this comment is required.

Response 1-2

The commenter states that the nearest Caltrans facility to the project site is State Route 22 (SR 22) and that Caltrans does not expect any significant adverse impact to the state highway system. No further response to this comment is required.

Response 1-3

The commenter states that the transportation of heavy construction equipment and use of oversized transport vehicles on state highways would require a Caltrans transportation permit. The proposed project would be required to comply with all applicable Caltrans regulations during construction. As applicable, a Transportation Permit would be obtained from Caltrans for the use of oversized vehicles associated with the proposed project that would be expected to travel on state highways.

The commenter also recommends limiting oversized vehicle trips to off-peak commute periods. As discussed in Chapter 4, Other CEQA Topics, Section 4.5, Mitigation Measures Applicable to the Proposed Project, on page 4-21 of the Draft Supplemental EIR, several mitigation measures from the 2008 EIR would be applicable to the proposed project and would be required to be implemented. Mitigation Measure 3 under Transportation on page 4-23 states that “construction-related truck traffic will be scheduled to avoid peak travel time on the I-405 and I-605 freeways, and State Route 22 (SR-22), as feasible.”

Comment Letter No. 2

From: Joyce Perry <kaamalam@gmail.com>
Sent: Wednesday, June 3, 2020 12:20 PM
To: Martin Grant
Subject: RE: NOA of Draft Supplemental EIR to Campus Master Plan Update EIR

Good afternoon Mr. Grant,

I am responding on behalf of the Juaneno Band of Mission Indians, Acjachemen Nation- Belardes to the Notice of Availablilty of the Draft Supplemental EIR to Campus Master Plan Update EIR.

2-1

We are in agreement with the mitigation measures regarding Native and Archaeo Monitoring and for the need of a treatment plan regarding inadvertent discoveries. We request to review the CRMPD when it becomes available.

2-2

Additionally, as this project is located in a shared territory, we ask that the concerns of all tribes in the area are considered, and that all tribes are given equal consideration for monitoring.

Húu'uni 'óomaqati yáamaqati.
Teach peace
Joyce Stanfield Perry
Payomkawichum Kaamalam - President
Juaneno Band of Mission Indians, Acjachemen Nation
Tribal Manager, Cultural Resource Director

Comment Letter 2: Juaneño Band of Mission Indians, Acjachemen Nation

Response 2-1

This comment includes introductory remarks and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft Supplemental EIR. Therefore, no further response to this comment is required.

Response 2-2

The commenter states that they agree with the mitigation measures pertaining to Native American and archaeological monitoring, and the need for a treatment plan related to inadvertent discoveries. The commenter requests an opportunity to review the cultural resources monitoring and discovery plan (CRMDP) when it becomes available. The commenter also states that the project is located in a shared territory and requests that concerns of all tribes in the area are considered, and that all tribes be given equal consideration for monitoring.

CSULB has an established process for consulting with Native American tribes regarding construction projects and ground-disturbing activities on the campus. As discussed in Section 3.4, Tribal Cultural Resources, on page 3.4-8 of the Draft Supplemental EIR, a Native American Sacred Lands File search was completed and consultation with California Native American tribes per the requirements of CEQA, as amended by Assembly Bill (AB) 52, was conducted to inform interested parties of the proposed project and to request any input concerning potential impacts to tribal cultural resources within the project area. Formal consultation involved contacting Native American representatives identified by the Native American Heritage Commission (NAHC) and individuals and groups known to have knowledge about the project area, in order to solicit comments and concerns regarding the project. The NAHC identified five Gabrielino tribes “who may also have knowledge of cultural resources in the project area.” Additionally, a representative for the Juaneño Band of Mission Indians–Acjachemen Nation notified CSULB that it had an interest in the project area. As discussed in Section 3.4 of the Draft Supplemental EIR, CSULB initiated consultation with these six tribes, and four of the tribes ultimately requested direct government-to-government consultation pursuant to AB 52, including the Juaneño Band of Mission Indians–Acjachemen Nation. Through consultation, which included both emails, phone calls, and opportunities for document reviews, CSULB provided the tribes with opportunities to raise concerns and provide input.

In accordance with mitigation measures required per the 2008 EIR, CSULB employs archaeological and Native American monitors during ground-disturbing activities associated with university construction, including for the proposed project. The campus understands the need to provide consideration to all interested parties in respect to construction monitoring on campus, and engages Native American monitors through an open and public competitive bid process.

In regard to the request to review the CRMDP, the campus will provide the CRMDP to the Juaneño Band of Mission Indians–Acjachemen Nation once it is available.

Comment Letter No. 3



Development Services

Planning Bureau
411 West Ocean Boulevard, 3rd Floor, Long Beach, CA 90802
562.570.6194

June 11, 2020

Martin Grant, Program Manager, Capital Construction
California State University
Long Beach Office of Design and Construction Services
1331 Palo Verde Avenue, MS#5805
Long Beach, California 90815
Via Electronic Mail: Martin.Grant@csulb.edu

Re: Supplemental Environmental Impacts Report – Campus Mater Plan

Mr. Grant,

This letter expresses the City of Long Beach's overall support for the Housing Expansion Phase 1 project. This project will demolish the hillside office building and construct two new buildings with a very modest increase of five net housing units. As the university grows, it remains critical to increase housing opportunities for students, faculty and staff.

Both the City and the university are facing severe challenges with housing supply and affordability. Within the City of Long Beach, over 20,000 households are housing insecure, and an estimated 4,000 people in the City experience homelessness each year. More than 47 percent of Long Beach households are cost-burdened, and 12 percent are experiencing overcrowding. The housing crisis affects households of all types, including students. This need is confirmed by the university system's basic needs initiative research.

The city is very proud of its productive relationship with the university. This includes working together, with private developer partners, to explore classrooms and housing within the City's downtown as well as other partnership opportunities. Even with this important work, it is necessary for the university to plan for and build additional student housing.

As part of the ongoing Campus Master Plan restudy and update as well as future planning, the university should consider adding considerably more units both at the main campus and the beachside college site. The City looks forward to supporting the university in these efforts.

Should you have any questions regarding this matter please reach out to Christopher Koontz, Planning Bureau Manager, at (562) 570-6288 or Christopher.Koontz@longbeach.gov.

Thank you,

A handwritten signature in cursive script that reads "Linda F. Tatum".

Linda F. Tatum, FAICP
Director of Development Services



3-1

Comment Letter 3: City of Long Beach Development Services, Planning Bureau

Response 3-1

The commenter expresses support for the proposed project, describes housing supply and affordability within the city, and recommends that CSULB consider adding more housing units in the future.

As discussed in Chapter 2, Project Description, Section 2.5, Project Purpose and Objectives, on page 2-8 of the Draft Supplemental EIR, the “overall purpose of the proposed project is to provide the space needed for student support services, including a housing and residential life office and a commons space in a central, accessible location within the Hillside College complex.” The proposed commons building would include five residential apartments for use by Housing and Residential Life staff, to replace two apartments that would be lost to demolition of the existing Hillside Office/Commons building, for a net increase of three units.

While the underlying purpose and project objectives for the proposed project do not include the provision of student housing units, other projects identified in and implemented under the 2008 Campus Master Plan do so, including the Parkside College residence hall complex, which is currently under construction and will add 476 student beds.

The 2008 Campus Master Plan acknowledged the need to expand residential offerings to serve growing enrollment numbers. As projects are implemented under the Master Plan, CSULB will continue to evaluate the need for student housing and ensure that such projects are consistent with the major objectives of the 2008 Campus Master Plan.

Comment Letter No. 4



POST OFFICE BOX 92521 LONG BEACH CA 90809
562.493.7019 LBHERITAGE.ORG

June 19, 2020

Martin Grant, Program Manager, Capital Construction
California State University, Long Beach
Office of Design + Construction Services
1331 Palo Verde Avenue MS#5805
Long Beach, California 90815
Via E-mail: Martin.Grant@csulb.edu

Long Beach Heritage Response to the Draft Supplemental Environmental Impact Report (EIR) for the Housing Expansion Phase 1 – Housing Administration and Commons Building Project

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Report (EIR) for the Housing Expansion Phase 1 – Housing Administration and Commons Building Project, located on the California State University Long Beach (CSULB) Campus within the Hillside College Complex, which consists of eleven buildings: two three-story residence halls (Los Alamitos Hall, Los Cerritos Hall, 1959), six two-story residence halls (Residence Halls A, B, C, D, E, and F, 1969), a one-story commons/office (1969), a one-story dining hall (1969), and a two-story residence hall geared toward international students (International House, 1987). The complex also includes a number of associated site and landscape features. CSULB proposes the demolition of the Hillside College commons/office building to construct two new buildings in its place: a two-story, commons building and a one-story, Housing and Residence Life office building.

4-1

Hillside College is eligible for listing in the National Register of Historic Places and the California Register of Historical Resources as a historic district, and is considered a historical resource for purposes of CEQA. All eight buildings within the district are contributing elements of the historic district. The EIR concluded that the demolition of the existing commons/office building and construction of a new, larger pair of buildings would result in a substantial adverse impact to the historic district that cannot be mitigated to a level of less-than-significant, and will diminish the integrity of the district to the extent that it is no longer eligible for listing in the National Register or California Register.

Long Beach Heritage opposes the demolition of the Hillside College commons/office building. The building and the Hillside College Historic District is a highly intact example of Modern campus buildings representing an important collaboration between architect Edward Killingsworth, project architects Neptune and Thomas, and landscape architect Edward Lovell.

4-2



The Draft EIR identified several alternatives which would reduce the impact to the Hillside College Historic District to less than significant, including the Renovation of Existing Building Alternative, which was identified as the environmentally superior alternative. Long Beach Heritage strongly encourages CSULB to select the environmentally superior alternative to prevent the demolition of the Hillside College District and prevent the irreversible demolition of a significant historic property. Long Beach Heritage and its members strongly believe CSULB can achieve a project which allows for the campus to expand and grow, while also preserving its architectural heritage.

4-2
Cont'd

The Draft EIR presents only two mitigation measures to reduce the impact of the demolition of the Hillside College District. These measures include photographic documentation and an interpretive center at the site. Given that the project will result in the loss of an entire historic district which consists of buildings and landscape, additional mitigation is recommended, including measures to prevent further loss of historical resources on the campus.

4-3

While the historic technical report prepared for the Draft EIR is thorough in its evaluation of the project site, the Historic assessment noted that the campus as a whole retains a "cohesive aesthetic that is not found at many other CSU campuses within the CSU system"- this suggests that there may be a larger historic district on the campus, which Hillside College Site may contribute to. The Draft EIR also notes that a campus-wide historic survey is underway. This analysis must be included and considered as part of the project analysis as there may be cumulative impacts related to the loss of Hillside College, as well as other projects at the campus, including the Soroptimist House and implementation of the Master Plan.

4-4

Long Beach Heritage requests that all preservation alternatives be explored as part of the EIR process and that further consideration be made to the overall impact to historical resources on the campus as a whole.

4-5

A handwritten signature in black ink, reading "Cheryl Perry".

Cheryl Perry
President, Long Beach Heritage

Comment Letter 4: Long Beach Heritage

Response 4-1

The commenter restates the description of the proposed project provided in Chapter 2, Project Description, of the Draft Supplemental EIR, and of the Hillside College complex, provided in Section 3.1, Cultural Resources, of the Draft Supplemental EIR.

Response 4-2

The comment states Long Beach Heritage's opposition to the demolition of the Hillside Office/Commons building and accurately summarizes the description of the Hillside College Residence Hall Complex Historic District that is provided in Section 3.1, Cultural Resources, on pages 3.1-16 and 3.1-17 of the Draft Supplemental EIR.

The commenter requests that the lead agency select the Renovation of Existing Building Alternative, which was identified in the Draft Supplemental EIR as the environmentally superior alternative, in order to prevent demolition of the existing building and the impacts to the historical resource. CEQA Guidelines Section 15126.6(a) discusses the consideration of alternatives in an EIR, stating that an "EIR shall describe a range of reasonable alternatives, which may include alternatives to the location of the proposed project, which would feasibly attain most of the basic objectives of the proposed project but would avoid or substantially lessen any of the significant effects of the proposed project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." CEQA Guidelines Section 15126.6(b) further elaborates that because "an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on the alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objective, or would be more costly."

The discussion of alternatives to the proposed project is presented in Chapter 5, Alternatives, of the Draft Supplemental EIR. As discussed in Chapter 5 of the Draft Supplemental EIR, several alternatives to the proposed project have been considered, including alternative designs, to accommodate the programming required for the project. The design alternatives include renovation of the existing Hillside Office/Commons building; demolition of the existing building and construction of a new building; and a split program option that would include renovation of the existing building to accommodate some uses and construction of a new building to accommodate the remainder of the uses. The alternatives carried forward for detailed analysis include the No Project Alternative, as required pursuant to CEQA Guidelines Section 15126.6(e), and three "build" alternatives: the Renovation of Existing Building Alternative, New Building at Corner Site Alternative, and New Building at Beach Drive Site with Renovation of Existing Building Alternative. As discussed in Chapter 5 of the Draft Supplemental EIR, because the existing Hillside Office/Commons Building would not be demolished under any of these alternatives, all four alternatives carried forward for detailed analysis would avoid the significant and unavoidable impact to historical resources identified for the proposed project. As such, the alternatives presented in the Draft Supplemental EIR represent a reasonable range of feasible alternatives that are capable of avoiding the significant effect of the project.

Pursuant to CEQA Guidelines Section 15126.6, an EIR shall identify an environmentally superior alternative among the feasible alternatives. As discussed in Chapter 5, Alternatives, subsection 5.5, Environmentally Superior Alternative, beginning on page 5-18 of the Draft Supplemental EIR, although the No Project Alternative would not meet any of the project objectives, it would result in the least impacts when compared to the proposed project and the three build alternatives. However, in accordance with CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the No Project Alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Accordingly, the Renovation of Existing Building Alternative was selected as the environmentally superior alternative, as it would result in the fewest new impacts among the three build alternatives. However, as discussed on page 5-19 of the Draft Supplemental EIR, this alternative would only partially meet three of the project's eight

objectives and does not achieve the remaining five objectives. Although the location of the existing Hillside Office/Commons building would be maintained under the Renovation of Existing Building Alternative, the renovations required to support the desired programming would be extensive. Additionally, the existing Hillside Office/Commons building footprint would remain the same and would continue to constrain the use of the site. The Renovation of Existing Building Alternative would adhere to the 2008 Master Plan's site and architectural guidelines to a certain extent by meeting all current accessibility codes; however, certain guidelines would not be implemented, including coordinating the building with the open spaces of the campus, provide for enhanced pedestrian circulation patterns, and featuring broad and welcoming entrances. The 2008 Master Plan identified the need to expand its residential offerings to serve their growing enrollment numbers, and while the Renovation of Existing Building Alternative does provide additional indoor common space for student use and would renovate the existing building, it would not provide adequate space to support the needed HRL student support services in a central, accessible location within the Hillside College complex.

A comparison of the impacts associated with the alternatives as compared to the proposed project is provided in Table 5-1, Comparison of Impacts of the Alternatives to the Proposed Project, on page 5-20 of the Draft Supplemental EIR. As discussed in the alternatives analysis presented in Chapter 5 and the comparison of impacts shown in Table 5-1, all four of the project alternatives would result in greater impacts related to operational energy usage and greenhouse gas emissions. As such, they would result in increased long term and ongoing operational impacts when compared to the proposed project. Furthermore, the three build alternatives would not meet most of the project objectives.

Additionally, the New Building at Corner Site Alternative and the New Building at Beach Drive Site with Renovation of Existing Building Alternative would result in additional impacts not identified for the proposed project. As discussed on page 5-11 of the Draft Supplemental EIR, the New Building at Corner Site Alternative would provide a space for the HRL office to be located but would rely on the existing Hillside Office/Commons building to provide the student commons space. The existing Hillside Office/Commons building would not be renovated and would remain as-is, with a limited indoor commons area for students that does not meet the 2008 Master Plan objectives of expanding its residential support areas to meet growing enrollment needs. In addition, the configuration of the building that would fit at the Corner Site would not be consistent with the Master Plan architectural guidelines related to building siting and setbacks due to the size and shape of the Corner Site parcel. In order to fit the appropriate footprint of the new building on the Corner Site, the building would be located closer to the active roadways of Earl Warren Drive and Beach Drive, and therefore would not be coordinated with the open spaces of the campus and provide for enhanced pedestrian circulation patterns. As the Corner Site would necessitate development of a new site to accommodate parking, construction activities would occur at two separate sites, which would result in increased construction activity, including increased ground-disturbing activities such as excavation and grading for the new building foundation which would increase the risk of encountering and disturbing previously unknown archaeological resources. In addition, the New Building at Corner Site Alternative would necessitate development of a new site to accommodate parking and would increase the number of locations on which development would occur, which would also increase the risk of encountering and disturbing previously unknown archaeological resources.

As discussed on page 5-14 of the Draft Supplemental EIR, the New Building at Beach Drive Site with Renovation of Existing Building Alternative would also result in additional environmental impacts compared to the proposed project because it would necessitate development of a new site to accommodate parking. As a result, construction activities would occur at three sites, which would necessitate increased construction activities over the proposed project. Additionally, the existing Beach Drive Site is currently used as an informal site for outdoor events. As such, construction on this site would limit this area as a recreational open space option for students, resulting in an additional impact not identified for the proposed project. Additionally, the New Building at Beach Drive Site with Renovation of Existing Building Alternative would not centrally locate student services within the campus and would situate the HRL office building in a location that is not easily accessible by pedestrians or vehicles. Traffic conflicts may arise with the location of this alternative, as student vehicles are not currently permitted to park along Earl Warren Drive or Beach Drive in the vicinity of the Beach Site location. A bus stop is currently located along Beach Drive adjacent to the Beach Site location that would be impacted by students temporarily parking along Beach Drive to

access the HRL office building, resulting in potential impacts to access and circulation not identified for the proposed project.

When considering the proposed project and comparing the alternatives, the lead agency must take into account all of the identified environmental impacts as well as the purpose and need for the proposed project. As discussed in Chapter 2, Project Description, Section 2.5, Project Purpose and Objectives, on page 2-8 of the Draft Supplemental EIR, the “overall purpose of the proposed project is to provide the space needed for student support services, including a housing and residential life office and a commons space in a central, accessible location within the Hillside College complex.” While the proposed project would result in a significant and unavoidable impact to the historical resource, it is worth noting that the build alternatives would increase operational impacts and, in some cases, introduce additional impacts when compared to the proposed project.

Response 4-3

The commenter describes the two mitigation measures to reduce the impact of the demolition of the Hillside College Residence Hall Complex Historic District as photographic documentation and an interpretive center at the site.

Mitigation measures for impacts to historic resources are provided on pages 3.1-24 and 3.1-25 in Section 3.1, Cultural Resources, of the Draft Supplemental EIR. Mitigation Measure CR-6 would ensure that CSULB document the property in a manner that complies with the Secretary of the Interior’s Standards for Architectural and Engineering Documentation and generally follows the National Park Service’s Historic American Building Survey (HABS) Level III requirements, including digital photographic recordation of the Hillside College Residence Hall Complex, a detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior’s Professional Qualification Standards for History and/or Architectural History, and the original archival-quality documentation shall be offered as donated material to the several entities, including the commenter, Long Beach Heritage.

Mitigation Measure CR-7 includes preparation and implementation of an interpretive program for the Hillside College Residence Hall Complex Historic District which will be installed in a publicly-accessible space in the new HRL office or commons building, made available on the CSULB website, and included into on-campus orientation and tours for educational purposes. The interpretive materials will include an on-site display of historic photographs, historic architectural plans and drawings, historic narrative, and other interpretive materials as available and deemed appropriate.

As discussed in Section 3.1.5, Level of Significance After Mitigation, even with implementation of Mitigation Measure CR-6 and Mitigation Measure CR-7, demolition of the existing Hillside Office/ Commons building would diminish the integrity of the historic district in such a way that it would no longer be eligible for listing in the NRHP or CRHR, resulting in a significant and unavoidable impact to the historical resource.

The commenter recommends additional mitigation. While other projects on the CSULB campus are not within the scope of this Supplemental EIR, CSULB will continue to evaluate future projects implemented under the 2008 Campus Master Plan for potential impacts to historical resources, as required by CEQA. If a project would necessitate the preparation of additional environmental analysis and documentation in conformance with the CEQA Guidelines, similar to the proposed project, that project would undergo environmental review and CSULB would be required to implement mitigation measures to reduce or minimize impacts to historical resources, as applicable.

Response 4-4

The commenter cites page 33 in Section 5.2, Origins and Development of Student Housing as CSULB, of the Historic Resource Assessment Report (Appendix A to the Supplemental EIR), which discusses the “cohesive aesthetic that is not found at many other campuses within the CSU system” and suggests that

the Hillside College site may contribute to a larger historic district on the campus. As discussed in the Historic Resource Assessment Report, the campus architectural historian consultant, Architectural Resources Group (ARG), determined that the Hillside College Residence Hall Complex Historic District is eligible for listing in the NRHP and CRHR. This determination was informed by campus-wide research and a windshield survey of the campus, as described on page 2 of the report in Section 1.2, Field and Research Methods, which aided in an understanding of the relationship of the Hillside College Residence Hall Complex Historic District to other campus buildings, including those designed by Edward Killingsworth. As stated therein, the Hillside College Residence Hall Complex Historic District is not geographically contiguous to or part of a larger district on the campus. In addition, the Hillside College Residence Hall Complex Historic District was specifically described in Killingsworth's master plan, which called for the construction of a new dormitory complex to the northwest of the academic core, where Hillside College is located today. As discussed on page 3.1-4 in Section 3.1.1.1, Built Historical Resources, of the Draft Supplemental EIR,

"Killingsworth's master plan was adopted in 1963, which included the construction of a new dormitory complex to the northwest of the academic core, where Hillside College is located today. In 1965, campus administrators announced plans to construct a new residence hall complex at the west end of Lower Campus and adjacent to Los Alamitos and Los Cerritos Halls, in the approximate location that Killingsworth had specified in the master plan. Conceptual plans for the buildings and landscape features were developed in 1966, and state funding for construction of the complex was appropriated shortly thereafter, in 1967-1968. Architectural firm, Neptune and Thomas and Associates, was hired to design the complex in consultation with Killingsworth. Neptune and Thomas's design deviated from the master plan with respect to scale. However, with respect to concept, Neptune and Thomas's design reflected essential tenets of the master plan. Specifically, it was located at the west end of the Lower Campus, was geographically removed from the academic core, directly interacted with the two existing dormitory buildings, was oriented around an internal circulation network with a residential character and evinced a sense of community. It also embodied the integral relationship between buildings and site that was such a pivotal tenet of the plan. Their design consisted of six residence halls, a central commons/office, and a dining hall, all of which were oriented around a central landscape that was designed by consulting campus landscape architect Ed Lovell. Construction of the complex began in 1967 and was completed by 1969. In 1971, the American Institute of Architects gave Donald Neptune and Joseph Thomas a Triennial Honor Award for their design of Hillside College."

Based on ARG's research and observations, Hillside College is not part of any larger campus historic district. Rather, research and site observations led to the determination that the Hillside College is eligible as a standalone district, as discussed above. Thus, the loss of the Hillside College Residence Hall Complex Historic District would not have a cumulative impact on any larger campus historic district.

The commenter expresses concern that there may be cumulative impacts related to the demolition of the Hillside Office/Commons building, as well as other past projects on campus. While other projects on the CSULB campus are not within the scope of this Supplemental EIR, related projects on the campus were considered, reviewed, and analyzed as part of the analysis of the cumulative impacts of the proposed project in conjunction with related projects. The commenter is referred to the cumulative impacts discussion in Section 3.1, Cultural Resources, subsection 3.1.6, Cumulative Impacts, on pages 3.1-26 and 3.1-27 of the Draft Supplemental EIR, which states:

"Table 2 2 in Chapter 2, Project Description, of this Supplemental EIR, includes all the approved or proposed development projects that would occur within the proposed project construction timeframe and located on the CSULB campus or within a one-mile radius of the campus. Construction of the proposed project would result in a significant and unavoidable impact to a historical resource as the existing Hillside Office/Commons building would be demolished. Development of the proposed project with related projects has the potential to result in a cumulative impact if historical resources are present within

related project sites. CSULB is currently undergoing a campus-wide identification of historic resources, and none of the buildings listed in Table 2-2 have been identified as historical resources or did not meet the age threshold for a potential historical resource. As such, the proposed project would not result in a cumulatively considerable impact related to historical resources.”

Response 4-5

The commenter requests that all preservation alternatives be explored as part of the EIR process. The commenter is referred to Response 4-2 regarding the alternatives explored as part of the EIR process.

The commenter also requests further consideration of the overall impact of the project to historical resources on the campus. The commenter is referred to Response 4-4 regarding potential cumulative impacts of the proposed project.

It should be noted that in the comments provided by the Los Angeles Conservancy in Letter No. 5, a meeting was requested that included representatives of the Los Angeles Conservancy, CSULB, and Long Beach Heritage. In response, CSULB reached out to the Los Angeles Conservancy and Long Beach Heritage and convened a telephonic meeting which took place on June 29, 2020 to discuss the shared concerns of the organizations.

Comment Letter No. 5



LOS ANGELES
CONSERVANCY

523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

June 19, 2020

Sent Electronically

Martin Grant, Program Manager, Capital Construction
California State University, Long Beach
Office of Design + Construction Services
1331 Palo Verde Avenue, MS#5805
Long Beach, CA 90815
Email: martin.grant@csulb.edu

**RE: Housing Expansion Phase 1 – Housing Administration and
Commons Building Project, Draft Supplemental Environmental
Impact Report (EIR) to the Campus Master Plan Update EIR
(SCH# 2007061092)**

Dear Mr. Grant:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the California State University, Long Beach (CSULB) Housing Expansion Phase 1 Draft Supplemental Environmental Impact Report (EIR). As stated in the EIR, the project will have significant adverse impacts to the National Register of Historic Places and California Register of Historical Resources-eligible (NRHP/CRHR) Hillside College historic district. The Hillside College district was constructed between 1966-1969 and designed by Pasadena based Neptune and Thomas and Associates with Killingsworth, Brady and Associates as the consulting Architects, and Edward Lovell as the Landscape architect. The district is eligible under criterion C/3 “as an excellent example of a period and type, as a cohesive collection of buildings and landscape features that express the values underpinning Mid-Century Modern architecture and planning”¹

As stated in the EIR, the proposed project will demolish the existing 5,700 square-foot Hillside Office and Commons buildings and construct a new two-story 8,000 square-foot commons building and a new one-story 4,500

¹ “California State University, Long Beach Housing Expansion Phase 1 – Housing Administration and Commons Building: Historic Resource Assessment Report,” prepared by Architectural Resources Group for California State University, Long Beach, April 27, 2020, 56.

5-1



square-foot Housing and Residential Life (HRL) office building. The demolition of existing resources and construction of new buildings in its place will result in the historic district no longer being eligible for listing in the NRHP/CRHR. The Conservancy is concerned by the University's continued chipping away of the campus's historic resources as seen with the recent demolition of the Soroptimist House and insensitive renovations to the College of Liberal Arts buildings.

5-1
Cont'd

5-2

1. A preservation alternative can meet the project goals while retaining the Hillside College's eligibility.

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history."² To this end, CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."³ The fact that an environmentally superior alternative may be more costly or fails to meet all project objectives does not necessarily render it infeasible under CEQA.⁴ Reasonable alternatives must be considered "even if they substantially impede the project or are more costly."⁵ Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.⁶

5-3

There are several project alternatives proposed within the EIR that retain eligibility of the historic district. These alternatives include the "Renovation of Existing Building Alternative," "New Building at Corner Site Alternative," and "New Building at Corner Site with Renovation of Existing Buildings Alternative."

We urge the University to select one of these three alternatives to avoid losing more historic resource on campus. The Conservancy believes a preservation minded alternative can be a "win-win" solution for the University's goal of modernization. It is a great concern of ours that should CSULB move forward with the proposed project, the remaining buildings will become increasingly threatened through the loss of the district's eligibility.

2. The loss of the Hillside College district may have cumulative impacts on a larger campus-wide historic district.

In 1962, the Board of Trustees for the CSU system retained the notable local architecture firm of Killingsworth-Brady-Smith and Associates to serve as consulting campus architect. Master architect, Edward Killingsworth served the campus in this capacity until his retirement in 2001.

5-4

²Public Resource Code, Sec. 21001 (b), (c).

³ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.

⁴ Guideline § 15126.6(a).

⁵ *San Bernardino Valley Audubon Soc'y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

⁶ Public Resources Code § 21081.5.



As a result of this 39-year tenure, the campus possesses a “characteristically cohesive aesthetic that is not found at many other campuses within the CSU system.”⁷ The CSULB campus successfully conveys modernist design principles through the campus layout and its low scale building design.

5-4
Cont'd

The Hillside College is situated near one of the campus’s primary entrances off Bellflower Boulevard. The low-scale district is an important contributor to the overall suburban feeling of the CSULB campus as envisioned by Killingsworth.

3. The Conservancy requests a meeting with CSULB.

The Conservancy requests a meeting with CSULB and to include representatives of Long Beach Heritage. We believe that a meeting with the requested parties will facilitate a meaningful dialogue between the preservation community and CSULB leadership. Through cooperation, a “win-win” outcome can be developed whereby CSULB can successfully modernize its campus to meet contemporary needs while also preserving its rich architectural history. We encourage CSULB to pursue an updated campus wide survey and complete a historic preservation plan that will guide future rehabilitation and new construction projects.

5-5

Conclusion

The Conservancy is concerned by CSULB’s desire to move forward with the proposed project as it will render a potential historic district no longer eligible. The demolition of two buildings compromises the integrity of all eight buildings to convey their significance. We urge the CSULB to pursue alternatives that meet the project goals, renovate existing buildings, and retain the historic district’s eligibility. Lastly, the Conservancy requests a meeting with CSULB and members of Long Beach Heritage to work on a long-term plan and strategy for the campus’s historic resources.

5-6

⁷ “California State University, Long Beach Housing Expansion Phase 1 – Housing Administration and Commons Building: Historic Resource Assessment Report,” prepared by Architectural Resources Group for California State University, Long Beach, April 27, 2020, 33.



About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

5-7

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Director of Advocacy

cc: Long Beach Heritage



Comment Letter 5: Los Angeles Conservancy

Response 5-1

The commenter accurately summarizes the historical significance of the Hillside Office/Commons building as set forth in the Draft Supplemental EIR and reiterates the description of the demolition and construction activities associated with the proposed project that is provided in Chapter 2, Project Description. This comment includes introductory remarks and does not state a specific concern or question regarding the adequacy of the analysis in the Draft Supplemental EIR. No further response to this comment is required.

Response 5-2

The commenter expresses concern regarding activities associated with other buildings on the campus. The commenter is referred to Response 4-3 regarding the loss of potential historical resources on campus. The commenter is also referred to Response 4-4 regarding potential cumulative impacts of the proposed project in conjunction with related projects.

Response 5-3

The commenter provides an overview of CEQA requirements pertaining to the evaluation of alternatives to a proposed project. The commenter also requests that the lead agency select one of the alternatives that would retain the eligibility of the Hillside College Historic District. The commenter is referred to Response 4-2 for a detailed discussion of the evaluation of alternatives considered for the proposed project.

Response 5-4

The commenter expresses their concern that the proposed project may result in cumulative impacts on other resources on the campus. Similar concerns were raised in Letter No. 4, submitted by Long Beach Heritage, which precedes this letter in the Final Supplemental EIR. The commenter is referred to Response 4-4 regarding the cumulative impacts of the proposed project in conjunction with other projects on the CSULB campus.

Response 5-5

The commenter requests a meeting that includes representatives of their organization, CSULB, and Long Beach Heritage. In response, CSULB reached out to the Los Angeles Conservancy and Long Beach Heritage and convened a telephonic meeting which took place on June 29, 2020 to discuss the shared concerns of the organizations.

Response 5-6

The commenter includes closing remarks summarizing the comments provided in detail in the body of the letter. The commenter is referred to Responses 5-1 through 5-5 above for responses to those comments.

Response 5-7

This commenter describes the membership, history, and purpose of their organization. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft Supplemental EIR. Therefore, no further response to this comment is required.

Comment Letter No. 6



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

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

Mr. Martin Grant, Program Manager
Office of Design + Construction Services
California State University of Long Beach
1331 Palo Verde Avenue
Long Beach, CA 90815

June 19, 2020
Ref. DOC 5715716

Dear Mr. Grant:

DEIR Response to Housing Expansion Phase I

The Los Angeles County Sanitation Districts (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on May 5, 2020. The proposed project is located within the jurisdictional boundary of District No. 3. We offer the following comments:

6-1

1. ES.1 Project Location and Settings, *page ES-1*, first paragraph – The Districts maintain sewerage facilities within the project's parcel that may be affected by the proposed project. Approval to construct improvements within a Districts' sewer easement and/or over or near a Districts' sewer is required before construction may begin.
2. Table 2-1, *page 2-1*, Proposed Uses for Commons and HRL Office Buildings – Based on the project specifications provided in the table, the expected increase in average wastewater flow from the project site is 1,218 gallons per day after the 5,700 square foot structure on the project site is demolished.
3. ES.2 Project Description, *page ES-2*, first paragraph – Development of the proposed project will generate an increase in average wastewater. The Districts are empowered by the California Health and Safety Code to charge a fee to connect (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. In determining the impact to the Sewerage System and if connection fees are applicable, 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 if fees are applicable to your specific project, the developer should contact the Districts' Wastewater Fee Public Counter. If a connection fee is applicable, payment will be required before this project is permitted to discharge to the Districts' Sewerage System. 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.

6-2

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 2717 or at araza@lacsd.org.

6-3

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ddg

cc: D. Thomas

DOC 5766426

Comment Letter 6: Los Angeles County Sanitation Districts

Response 6-1

The commenter states that the proposed project is located within the jurisdictional boundary of Los Angeles County Sanitation District No. 3. This comment includes introductory remarks and does not state a specific concern or question regarding the adequacy of the analysis in the Draft Supplemental EIR. No further response to this comment is required.

Response 6-2

The commenter states that the Los Angeles County Sanitation Districts (the Districts) maintain sewer facilities within the boundaries of the project site that may be affected by the proposed project, and that approval to construct improvements within, over, or near the Districts' facilities would be required prior to the start of construction. The commenter also provides an estimate of the anticipated net increase in average wastewater flow based on the proposed project uses. The commenter also states that a fee for connecting the proposed project to the sewer system may be applicable and outlines the process for determining such a fee.

According to the most recent map of campus easements, the nearest sewer is located more than 75 feet north of the project site. As such, impacts to the existing line are not anticipated to result from implementation of the proposed project. Nevertheless, it should be noted that CSULB currently coordinates with the Districts regarding approval and payment of connection fees, as applicable, for implementation of new or renovated buildings on the campus.

As discussed in Chapter 1, Introduction, on page 1-1 of the Draft Supplemental EIR, the existing Hillside Office/Commons building within the Hillside College residence hall complex was proposed for demolition and replacement in the Campus Master Plan and Campus Master Plan Update EIR (State Clearinghouse #2007061092), certified by the CSU Board of Trustees in May 2008 (2008 EIR). CSULB now proposes to implement this project with minor modifications compared to its original description in the 2008 Campus Master Plan, necessitating the preparation of this Supplemental EIR to analyze the potential impacts associated with these minor modifications. As the environmental documentation prepared for the proposed project supplements the 2008 EIR, this document is focused on those environmental resource areas in which the proposed project was determined to have the potential for new or substantially more severe significant direct, indirect, and/or cumulative environmental effects, pursuant to CEQA Guidelines Section 15163. As shown in Chapter 4, Other CEQA Topics, Table 4-1, beginning on page 4-1 of the Draft Supplemental EIR, an analysis of the proposed project's consistency with the 2008 EIR was prepared. As shown in Table 4-1, the proposed project would be consistent with the 2008 EIR determination that impacts related to water, wastewater, and stormwater would be less than significant. Additionally, all relevant Best Management Practices and mitigation measures identified in the 2008 EIR would also be applicable to the proposed project described in the Supplemental EIR.

The commenter is referred to the 2008 EIR, available on the CSULB website here: https://www.csulb.edu/sites/default/files/groups/physical-planning-and-facilities-management/PP/csulb_feir_final_pdf.pdf. As discussed in Chapter 2, Project Description, on page 20 of the 2008 EIR, one of the project actions listed for the Campus Master Plan and subsequent implementing actions, which include the proposed project described in the Draft Supplemental EIR, is to acquire the Districts' "approval of new connections and approval of fees for new connections and/or increase in quantity of wastewater from existing connections, if any". Additionally, as discussed in Section 3.5, Utilities and Service Systems, Sewer, on page 70 of the 2008 EIR, "since the Los Angeles County Sanitation Districts' sewer facilities run through the campus, in compliance with existing regulations, the University will obtain an approval prior to any sewage system or other improvements within the sewer easement or over or near a Districts' sewer. Compliance with these existing requirements will ensure that the Districts' sewer facilities will not be adversely affected." Therefore, CSULB will continue to coordinate with the Districts regarding approval of any new connections and associated fees, as applicable, prior to construction in accordance

with existing practices and in accordance with the Mitigation Monitoring and Reporting Program adopted upon certification of the 2008 EIR.

Response 6-3

The commenter states that all other information regarding the Districts' facilities and sewer service in the document is current. The comment also includes closing remarks. No further response to this comment is required.