

Jeff Miller

P.O. Box 3310, Long Beach, California 90803

telephone 562.433.2795
email: jeff.miller@csulb.edu

16 May 2017

Mayor Robert Garcia
City Council members
City of Long Beach
333 West Ocean Boulevard
Long Beach, CA 90802

Re: Appeal of Application Number: 1405-01, Approval(s) Requested: Site Plan Review, Conditional Use Permit, Standards Variance, and Local Coastal Development Permit

I ask that you reject the Planning Commission's decision and uphold these appeals.

Here is the real question: IS Long Beach the Aquatic Capital Of America? What does it take to be the Aquatic Capital? Will City Hall provide and maintain adequate beach and Tidelands facilities for Long Beach to be the Aquatic Capital Of America?

The Aquatic Capital of America Foundation lists these activities on their web site, which I quote:

Beach Volley Ball
Yachting
Beach Tennis
Boat Racing
Congressional Cup
Beach Water Polo
Naples Island Swim
Stand Up Paddling

And these objectives, I am quoting again:

Promote Long Beach as a destination for visitors seeking to participate in the myriad of aquatic activities offered in our city

Promote water safety and education

Increase the number of local aquatic facilities

This is a good list of objectives, and I support them. I believe we CAN all find a way to work together to make this happen. Wouldn't it be wonderful to see Long Beach make a success of this?

It won't happen with this plan, however. There is so much wrong with the Belmont Beach and Aquatic Center proposal that it must be put on hold, revisited, and moved forward in a way that will be a success for Long Beach and be built before all of the young swimmers and divers are adults.

The most obvious problem with the Belmont Beach and Aquatic Center plan is its location on a beach subject to expected sea level rise, wave action, and shoreline erosion. This is the primary reason why it is so expensive. Simple logic and reason leads to the obvious question: why build it on the beach? This was addressed in the California Coastal Commission's letter to the City on May 11. That letter also states other concerns about a beach location, such as the impact on coastal views. At 78 feet tall, this structure would be far higher than anything else in the area. It would tower over the trees. Despite claims in the City's staff report and EIR, it would NOT be transparent - it would be visible and interfere with coastal and ocean views from every direction, from many blocks around. The base alone would be a seven foot tall block of concrete. A beach location is problematic also because of the impact on coastal access due to increased traffic. The Commission staff recommends the City choose a different location. And the Coastal Commission DOES matter: there will be a Coastal Commission hearing, and the City must gain their approval of this or any project in the Tidelands area.

Coastal Commission concerns, the excessive cost, and lack of additional Tidelands funding, are all major factors that will likely prevent this facility from ever being built on the beach. And that excessive cost is all attributable to the poor choice of a beach location. As currently proposed, the city must raise an additional \$43 million beyond the \$60 million of Tidelands funds it plans to use.

Why not build the pool at a suitable location? Where it would not require the expensive deep foundation pilings and a seven foot tall concrete platform? Then it would likely cost far less than the projected \$103 million. For example: The Mayor has previously offered a downtown property for the George Lucas Museum, but that museum has selected a different location. That property has also been offered as a venue for the 2024 Olympics. The Aquatic Center could be built at that same downtown site. In this scenario, there would likely be some Tidelands money left over for the other, currently unfunded, needs at the beach.

Even if there were sufficient Tidelands funds to build at the Belmont Beach location, which there ARE NOT, it would be at the expense of the many neglected and delayed and unfunded beach area projects that are well documented that are dependent on the same pot of Tidelands funds. These currently add up to \$358 million. These projects are necessary to support the very items listed by the Aquatic Capital of America!

These include: rebuilding or renovating the Belmont Pier, building a lifeguard and marine safety headquarters in the Second District, replacing the Leeway Sailing Center, Marine Stadium repairs, water quality improvement, and maintaining the beach pedestrian and bike paths, to name only a few specific items. Additionally, many millions of dollars of Tidelands funds are needed to repair the crumbling Naples sea walls.

The increased operating and maintenance costs of this facility, designed with an elaborate "bubble" roof, an expensive moveable floor in the pool, and a separate pool only for diving, would be a huge strain on the city's budget, and would greatly impact the ability of the Parks, Recreation, and Marine Department to maintain the city's parks. The figure given by the city for the additional maintenance cost of the Belmont Beach and Aquatic Center pools is \$1.8 MILLION ANNUALLY.

Back to the plan for the Belmont Beach and Aquatic Center. How did we get to this point? Why are we headed down a dead-end path with this project? The citizens of Long Beach never had sufficient opportunity to provide input on this. THE CITY NEVER ASKED US! The stakeholder committee that designed the Belmont Beach and Aquatic Center had ONLY ONE neighborhood representative. Most of the other members have specific interests in the private and commercial aquatic enterprises that want this facility built, in ONLY THIS location. That is another one of the reasons why the EIR is flawed. It gave no real consideration to other possible locations and sources of funding.

Much of the public never even knew what was being planned, and they still don't know the details today. The public never had a realistic way to evaluate and comment on the design. There was insufficient representation of the location, size, and height of the structure. For example, how many people understand this structure would have a 33 foot tall vertical elevator tower almost touching the bike and pedestrian paths? How many people know the Belmont Beach and Aquatic Center would be nearly three times larger than the old pool building? How many people know it would be 18 feet taller? How many people know of the plan to seat 4,000 spectators there? And park their cars there? Beach parking is limited and already impacted. Where exactly could parking be provided?

Even after the design process was completed and the public could evaluate the design and comment on it at the Zoning hearing and the Planning Commission hearing, the city did not follow its own ordinance which requires informing the public of the proposed variance from zoning height limits by erecting story poles at the project site. Using story poles to demonstrate the height and footprint of a structure is a common practice throughout California. When the city was called out for this lapse, they still failed to comply with the intent of the law: ONLY ONE SINGLE POLE was erected to represent the entire proposed structure of over 125,000 square feet! And that pole, 78 feet tall, did not have a marker or flag to show the legal zoned height of thirty feet. Why were there no poles around the edges of the building site, showing how much taller it would be above the thirty foot limit? As the drawings in the EIR show, almost the entire perimeter of the building is taller than the legal limit!

At the outset of the design process, we were told repeatedly, the Belmont Beach and Aquatic Center would be built ENTIRELY with Tidelands funds. Now we know, this is NOT TRUE. There has been mention of tapping into the city's Measure A funds which are intended to be used for public safety and infrastructure. There is talk of using LA County parks funds, which are intended to be used for enhancing the city's parks. There is talk of using federal infrastructure funds.

The new impacts on available parking spaces and increased traffic at the beach are recent conditions that require an updated EIR traffic and parking study. For example, there is already greatly increased parking usage by the new Olympix Fitness health club next door to the site. They have a permitted occupancy of more than 500 people and no parking of their own. And the Ocean Boulevard "Road Diet" has narrowed the street to one lane in each direction in the area of the project.

In conclusion: the Belmont Beach and Aquatic Center will NOT in itself make Long Beach the Aquatic Capital of America. It will NOT be feasible to hold events to accommodate the thousands of spectators planned. Other beach and swimming and Tidelands needs would be delayed or neglected. Parks throughout the city would NOT receive the funding needed. It is likely that the Coastal Commission will NOT approve this beach encroachment, as detailed in the May 11 letter to the City from their District Director.

Don't let this happen! Don't waste more time! Uphold these appeals and revisit the Belmont Beach and Aquatic Center plan. Let's work together to make a plan that WILL make Long Beach an aquatic capital!

Thank you.



Jeff Miller