

**CALIFORNIA COASTAL COMMISSION**

SOUTH COAST DISTRICT OFFICE

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**F13**

**Deputy Director's Report for Los Angeles County**

**May 10, 2024**

**EXHIBITS**


# EXHIBIT 1 - Objections Received to Executive Director's Determination

Comments for South Coast Deputy Director's Report 4/10/24

anngadfly@aol.com <anngadfly@aol.com>

Fri 4/5/2024 5:00 PM

To:Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov>;Palm, Jeffrey@Coastal <jeffrey.palm@coastal.ca.gov>; SouthCoast@Coastal <SouthCoast@coastal.ca.gov>;Hudson, Steve@Coastal <Steve.Hudson@coastal.ca.gov>  
Cc:Tahesha Knapp-Christensen <taheshakc259@gmail.com>;Elliot Gonzales <oururbanparadise@gmail.com>;Alyssa Bishop <alyssabishopyoga@gmail.com>;Rebecca Robles <rebrobles1@gmail.com>;Charles Moore <cmoore@algalita.org>;Karen Harper <ksharper01@cs.com>;Anna Christensen <annachristensen259@gmail.com>

 2 attachments (330 KB)

Pool CDP extension 424.jpeg.pdf; WTF Logo.png;

Re: Extension Request for Coastal Development Permits Nos. 5-18-0788, A-5-LOB-17-0032 & A-5-LOB-20-0007

Dear Dr. Hucklebridge, Mr. Hudson and Commissioners:

The Sierra Club Los Cerritos Wetlands Task Force asks you to reconsider your determination that there are no changed circumstances affecting the proposed development of the Belmont Aquatic Pool which allows the extension of the CDP for another year.

We believe there are several changed circumstances since the granting of this CDP in February, 2021.

1. The approved plan is now totally changed with no seating for parents or spectators.
2. The approved plan has been changed to remove the roof. This open air pool will eliminate use for all of the public except for the hardiest of swimmers in the winter and evening hours. Children, elders and disabled will be unable to use this pool year round, as they would have with an enclosed pool.  
The heating costs will be greater for a roofless pool.  
It will be very difficult to keep an open pool free of blowing sand and trash.
3. There is no equity plan for youth living in other parts of Long Beach, as was ordered by the Commission when granting this CDP. The City has had 3 years and a previous extension to provide this.
4. Sea level rise is occurring faster than anticipated, making building this pool on the sand in a liquefaction zone even more risky than it was previously.
5. The Long Beach Convention Center Parking Lot/Elephant lot is now an available location for the pool, as the lease with the Seventh Day Adventists has been cancelled.

We urge you to deny this extension and direct the City to find a safer, more equitable location for this community pool.

Sincerely,  
Ann Cantrell & Anna Christensen, co-chairs



April 9, 2024

To: Executive Director, California Coastal Commission

From: Long Beach Area Peace Network

Re: Extension Request for CDP Permits Nos 5-18-0788, A-5-LOB-17-0032, & A-5-LOB-20-007

The Long Beach Area Peace Network objects to the Executive Director's decision to grant this request based on the determination of no changed circumstances affecting the proposed development's consistency with the Coastal Act. We also object to this CDP Extension request being placed on the Agenda of the April 10th Coastal Commission Meeting. The ten working day deadline to object in writing to the permit extension falls after the April 5th deadline for written comments to be received in order to be reviewed by Coastal Commission staff and the Commissioners themselves prior to the April Coastal Commission meeting and the April 10th Executive Director's report. The ability for the Executive Director and the Commissioners to consider all written objections raised prior to the deadline for written objections to the CDP before deciding whether or not to object to granting the extension, cannot not be complied with. Therefore, we ask that this agenda item be postponed until the May meeting of the Coastal Commission.

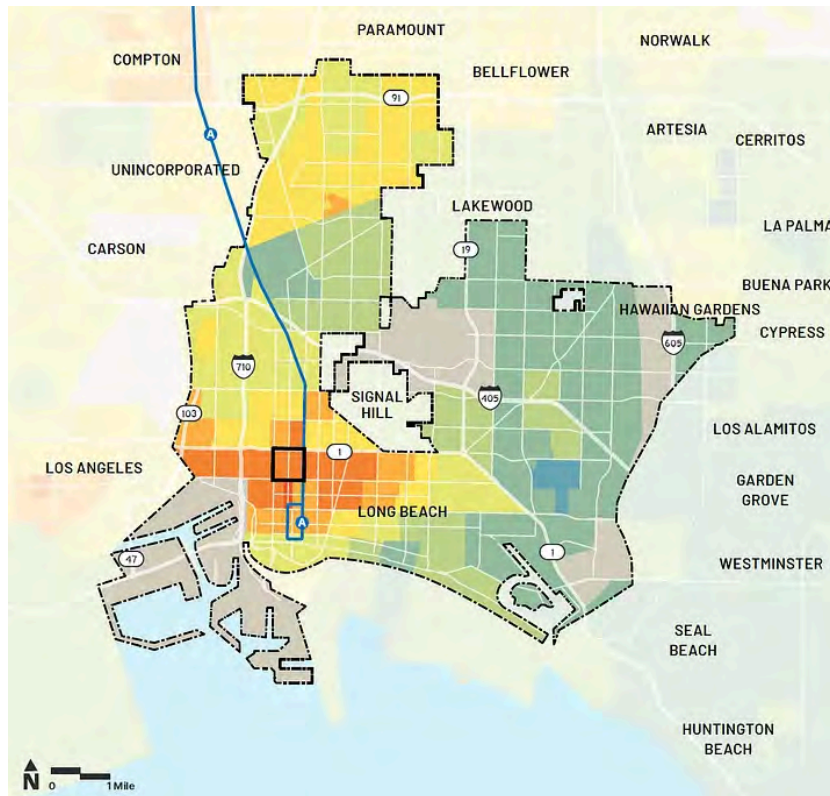
The Long Beach Area Peace Network finds that the following changed circumstances affect the proposed development's consistency with the Coastal Act and request that the extension be denied.

1. When considering the original CDP, Coastal Commission staff requested that alternative locations be considered for the proposed project. The City of Long Beach refused to do so, even though, in order to maintain public access and public safety, the proposed location on the beach will require beach replenishment/nourishment and, eventually, removal of the structure due to sea level rise. The City's position is that this is the only available site given that funding the project requires Tidelands monies that can only be spent in specific "Tidelands" areas.. In the past, the City argued that a downtown location in the Tidelands known as the Elephant Lot had to be excluded due to a long term lease held by the Seventh Day Adventists. That lease has now expired and, as this location is now available, it must be considered. The proposed development's consistency with the coastal act having No Preferable Alternative has now changed as the Elephant Lot is now a possible location which is safer, more protective of coastal resources, and more environmentally just. It is less susceptible to sea level rise, more centrally located, and more accessible to low-income people of color living in neighborhoods subject to extreme heat, without public pools and lacking the multiple coastal recreational amenities enjoyed by the primarily white and wealthy residents at the proposed location.
2. Due to funding considerations, the size and scope of the original project has been reduced. It now fails to provide the same public amenities or the level of access for disadvantaged, at-risk, and or historically marginalized communities required by the Coastal Act. Given that the proposed location, in a primarily white, affluent corner of the city with a lower number of children overall, the

CDP was conditioned on the City providing transportation and other incentives to residents living across town in disadvantaged neighborhoods, mostly lacking public pools. Other than for youth participating in recreational programs who may be able to visit the pool occasionally, the City has, to our knowledge, not agreed to a public bussing program or bus passes for POC/low-income residents. While scholarships are available to some youth, there is no free recreational time nor classes nor lessons for the majority of POC/ low-income residents. Additionally, the removal of the roof and of all seating (including stadium seating) means that the facility will no longer be accessible to those who cannot visit the pool during the day in warmer months. Nor will there be seating for parents and/or community members accompanying youth or elders participating in water recreation or classes.

3. The climate is warming at a pace unprecedented in recent history and this “changed circumstance” deserves to be taken into consideration with respect to the requested CDP extension. Not only is the proposed project location less safe and sustainable, but the residents having little or no access to this amenity are more exposed to heat island effect. *“Extreme heat affects people of color and low-income communities more,”* said Jennifer Ly, city planner with the City of Long Beach. *“Urban heat islands are areas that experience higher temperatures than nearby less developed areas because they have more paved surfaces and buildings, and less vegetation. They occur when buildings and pavements absorb heat during the day and radiate the heat at night, leading to poor air quality and health problems. The urban heat island effect, made worse by climate change, disproportionately impacts communities of color and low-income communities.”*

<https://blog.altaplanning.com/this-is-cool-new-toolkit-has-strategies-for-heat-mitigation-in-transportation-projects-1ddccb9efaa>



Heat Island Effect, Long Beach

4. *“The Commission will use its legal authority to ensure equitable access to clean, healthy, and accessible coastal environments for communities that have been disproportionately overburdened*

*by pollution or with natural resources that have been subjected to permanent damage for the benefit of wealthier communities. Coastal development should be inclusive for all who work, live, and recreate on California's coast and provide equitable benefits for communities that have historically been excluded, marginalized, or harmed by coastal development."*

Environmental Justice Policy, California Coastal Act.

Circumstances have changed with respect to the ability of the Coastal Commission to fully commit to enforcing its Environmental Justice policy. As marginalized groups are better able to advocate for themselves and shine a light on historic and current inequities, decisions that may have seemed acceptable in the past can be challenged when informed by a deeper understanding of both privilege and prejudice. We ask that this Commission deny the CDP Extension and take this opportunity to require that the City of Long Beach find a truly sustainable and equitable location for this aquatic facility.

Thank you,  
Long Beach Area Peace Network  
Contact: Anna Christensen, Swimming Pool Committee  
[annachristensen259@gmail.com](mailto:annachristensen259@gmail.com)


# Re: Long Beach Belmont Beach & Aquatic Center Extension Request for Coastal Development Permits Nos. 5-18-0788, A-5-LOB-17-0032 & A-5-LOB-20-0007

Melinda Cotton <mbcotton@hotmail.com>

Wed 4/10/2024 6:03 PM

To:Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov>;Palm, Jeffrey@Coastal <jeffrey.palm@coastal.ca.gov>; SouthCoast@Coastal <SouthCoast@coastal.ca.gov>;Hudson, Steve@Coastal <Steve.Hudson@coastal.ca.gov>;Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>  
Cc:Ann Cantrell <AnnGadfly@aol.com>;Tahessa Knapp-Christensen <taheshakc259@gmail.com>;Elliot Gonzales <oururbanparadise@gmail.com>;Alyssa Bishop <alyssabishopyoga@gmail.com>;Rebecca Robles <rebrobles1@gmail.com>; Charles Moore <cmoore@algalita.org>;Karen Harper <ksharper01@cs.com>;Anna Christensen <annachristensen259@gmail.com>

1 attachments (315 KB)

 Pool CDP extension 424.jpeg.pdf;

Dear Dr. Hucklebridge, Mr. Hudson and Commissioners,

I joint the Sierra Club and many others in asking that you recognize the many changed circumstances that have taken place in the ten years that have passed since the City of Long Beach submitted its request for an entirely new Belmont Aquatic Complex **on the beach** in Belmont Shore.

As forty year residents of Belmont Shore, living only two blocks from the beach and some ten blocks from the site of the proposed new pool, my husband and I have observed the exponential use of the beachfront area. **A new Environmental Impact Report should be required!!!** The beach and ocean are a huge draw for inland residents, and especially disadvantaged families and youth who live far from the beach. The Belmont Pier and the pedestrian and bike path extending from downtown to the Peninsula is a huge draw year round, as well, but especially on weekends and hot summer days.

Many families and visitors need to drive to the beach in order to bring the whole family and the picnic baskets, equipment, towels and change of clothes needed for a full day at the beach. Parking in the Belmont Pier and Pool area is already crowded and heavily parking impacted. Traffic is heavy already, and becoming heavier almost every day as very large new multifamily and multipurpose construction projects have been allowed on Pacific Coastal Highway and ADU's and larger homes are allowed is coastal areas.

In addition, the Commission and City have allowed new food service facilities on the beach in several locations bringing in additional traffic and parking pressure.

We urge you to recognize the very changed circumstances that will hinder Coastal Access by the average person if the Belmont Aquatic Complex is allowed ... the existing Community Pool is appropriate and a good fit for the location.

Thank you for your attention and consideration. **Please require a new EIR.**

Melinda Cotton



April 11, 2024

To: District Director, South Coast, Los Angeles County, California Coastal Commission

Re: Extension Request for CDP Permits Nos 5-18-0788, A-5-LOB-17-0032, & A-5-LOB-20-007

From: Coastal Sub-committee, Sierra Club CA

Dear Mr. Hudson,

We join Sierra Club's Los Cerritos Wetlands Task Force in opposing the City of Long Beach's request for an extension of CDP permits for the Belmont Beach and Aquatic Center/Belmont Pool Complex. We find that there are multiple "changed circumstances" that affect the consistency of the development now being proposed with the LCP and the Coastal Act. Additionally, we ask that the project be amended to bring it into greater compliance with the Coastal Act's environmental justice and coastal access policies.

The current site for the project would eliminate an existing "sandy beach area" increasingly vulnerable to sea level rise and storm events. Coastal erosion is advancing faster than anticipated and this changed circumstance makes preservation of existing beaches imperative. Beach replenishment to preserve access to the tideline will be required sooner than anticipated. In 2020, the City's effort to move sand into this area had to be abandoned due to the creation of sinkholes and we cannot assume that this special conditions of the current CDP will protect either the structure or the public, see <https://www.cbsnews.com/losangeles/news/long-beach-sand-erosion-project-sinkholes/>.

Additionally, Due to SLR, the City is required to eventually demolish the structure. Due to the changed circumstances of more rapid SLR and increased storm events, this will likely take place within the lifetime of the structure making the project less sustainable and safe.

Circumstances have also changed with respect to available alternative locations. The City's rationale for the rejection of an Alternative Site (the Elephant Lot) no longer applies. Due to a long term lease of this City owned property, the City had originally stated that it did not comply with "with Objective 3, to minimize the time the public is without a permanent pool facility." This lease has now expired and, most critically, this alternative site is less susceptible to Sea Level Rise and storm events. It is also more centrally and equitably located downtown in a primarily POC neighborhood. The Commission will risk violating both Coastal Act equal access and environmental justice policies should it extend the current CDPs without consideration of this alternative site.

The current project site is located in the Third District, the most affluent and whitest corner of the City with the least number of youth overall. This neighborhood has historically enjoyed the greatest access to the coast and to coastal public recreational amenities. As the seventh largest city in California, Long Beach is now more diverse than when the project was approved. And yet, the City has made no effort to outreach to or share revised project designs outside of the Third District. Changing demographics make prioritizing equal access to coastal and to recreational facilities critical to reversing a local history of red lining and other forms of racism. Public pools are not simply recreational facilities but also have the capacity to ensure that community members are water safe and able to qualify for employment in water related areas. We would point out that the City has only two permanent public pools, each 25 meters in length, and has never sought to ensure that residents, especially youth of color, learn to swim.

The Project as originally proposed included a Special Condition requiring a plan to address lack of equal access to the project site by disadvantaged, marginalized, underserved and vulnerable communities in Central, West, and North Long Beach. While the CDPs can be extended without such a plan, we are concerned that the City appears to now be offering only some free recreational swim time, some scholarships for lessons, and busing for some youth participating in other recreational programs. This falls short of former promises of new bus lines and fails to accommodate seniors and adults.

Due to concerns that funding the original project with Tidelands monies would no longer be possible, the City has redesigned the structure and reduced both recreational and competitive aquatic offerings. The most concerning is the change from a primarily indoor facility with stadium seating to an entirely outdoor facility with no seating at all. The revised design will not be able to provide the same level of access as did the former Olympic Pool at this site which offered year-round and evening instruction and recreation, or as did the Belmont Beach and Aquatic Center when originally proposed. This changed circumstance further restricts equal access to working people and their families, to seniors, and to others unable to endure the harsh conditions of cold nights and windy, sandblown afternoons.

We would note that adding zip lines and other “fun” amenities is not a legitimate way to address race and class inequality. The fact that the majority of POC youth are not learning to swim means that they will be less likely to use this facility, not only because it is far from their homes, but also because recreating in a pool is only enjoyable if one can swim. The primary users of the proposed project will continue to be private swimming, diving, and aquatics clubs and teams and those living nearby. Only when the City prioritizing building community pools offering free swimming lessons will this situation change. Building an indoor facility on the Elephant Lot would be a good start.

We propose that the CDP be amended to

1. Change the site of the facility to one that is more centrally located and accessible to the majority of Long Beach residents, primarily POC.
2. Require that the City fully fund and finalize plans to address SLR, including removal of the facility, before a permit extension is granted.
3. Require the the City of Long Beach, produce and fund a plan to ensure equal access to the facility with respect to its majority/minority population.
4. Require that the facility be primarily indoors and provide seating.

Respectfully,

Nancy Okada, Coastal Sub-committee, Sierra Club CA