

**FINAL ENVIRONMENTAL IMPACT REPORT**

**BELMONT POOL REVITALIZATION  
PROJECT**

**RESPONSE TO COMMENTS  
AND ERRATA**

**CITY OF LONG BEACH**

**SCH NO. 2013041063**

**LSA**

August 2016

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PROJECT**

**RESPONSE TO COMMENTS**

**AND ERRATA**

**CITY OF LONG BEACH**

**SCH NO. 2013041063**

Submitted to:

City of Long Beach  
Development Services/Planning Bureau  
333 West Ocean Boulevard, 5<sup>th</sup> Floor  
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Project No. CLB1302

**LSA**

August 2016

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- C: Study Session City Council Transcript (June 14, 2016)
- D: Mitigation Monitoring and Reporting Program

## 1.0 INTRODUCTION

This document comprises the Comments and Responses and Errata volume of the Final Environmental Impact Report (EIR) for the proposed Belmont Pool Revitalization project (proposed Project). The purpose of this document is to respond to all comments received by the City of Long Beach (City) regarding the environmental information and analyses contained in the Draft EIR. As noted in some of the responses, corrections and clarifications to the Draft EIR have been proposed. These changes are reflected in Chapter 3.0, Project Description, of this document and should be considered part of the Final EIR for consideration by the City prior to a vote to certify the Final EIR.

As required by the *California Environmental Quality Act (CEQA) Guidelines (State CEQA Guidelines)* Section 15087, a Notice of Completion (NOC) of the Draft EIR for the proposed Project was filed with the State Clearinghouse on April 13, 2016, and the Notice of Availability (NOA) of the Draft EIR was filed with the County of Orange (County) Clerk on April 13, 2016.

The Draft EIR was circulated for public review for a period of 65 days, from April 13, 2016, to June 16, 2016. The NOA and/or copies of the Draft EIR were distributed to all Responsible Agencies and to the State Clearinghouse in addition to various public agencies, citizen groups, and interested individuals. Copies of the Draft EIR were also made available for public review at the City Development Services Department, the Long Beach Main Library, the Bay Shore Neighborhood Library, and on the City's website.

A total of 61 comment letters were received during the public review period or immediately thereafter. Comments were received from State and local agencies and organizations, as well as interested individuals. Comments that address environmental issues are responded to thoroughly. Comments that (1) do not address the adequacy or completeness of the Draft EIR; (2) do not raise environmental issues; or (3) do request the incorporation of additional information not relevant to environmental issues do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*.

Section 15088 of the *State CEQA Guidelines*, Evaluation of and Response to Comments, states:

- a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.
- b) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed Project to mitigate anticipated impacts or objections). In particular, major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be

addressed in detail, giving the reasons that specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.

- c) The response to comments may take the form of a revision to the Draft EIR or may be a separate section in the Final EIR. Where the response to comments makes important changes in the information contained in the text of the Draft EIR, the lead agency should either:
  - 1. Revise the text in the body of the Draft EIR; or
  - 2. Include marginal notes showing that the information is revised in the responses to comments.

Information provided in this Final EIR clarifies, amplifies, or makes minor modifications to the Draft EIR. No significant changes have been made to the information or analysis contained in the Draft EIR as a result of the responses to comments, and no significant new information has been added that would require recirculation of the Draft EIR document.

## 1.1 INDEX OF COMMENTS RECEIVED

The following Table A consists of an index list of the agencies, organizations, and individuals that commented on the Draft EIR prior to the close of the public comment period or immediately thereafter. Comments received during public meetings were transcribed, responded to this Final EIR, and are included in the table. The comments received have been organized by date received and in a manner that facilitates finding a particular comment or set of comments. Each comment letter received is indexed with a number below.

**Table A: List of Comments Received**

| <b>Comment Code</b>                     | <b>Signatory</b>                          | <b>Date</b>    |
|---|---|----------------|
| <b>State Agencies</b>                   |   |                |
| S-1                                     | California Department of Transportation   | June 15, 2016  |
| S-2                                     | California Coastal Commission             | June 16, 2016  |
| S-3                                     | State Clearinghouse and Planning Unit     | June 17, 2016  |
| <b>Local Agencies/Utility Providers</b> |   |                |
| L-1                                     | Los Angeles County Sanitation District    | May 27, 2016   |
| <b>Interested Parties</b>               |   |                |
| I-1                                     | James Lent                                | April 18, 2016 |
| I-2                                     | Brian Patno                               | April 26, 2016 |
| I-3                                     | Jason Ziccardi                            | April 30, 2016 |
| I-4                                     | Billy Covington                           | May 3, 2016    |
| I-5                                     | Laura Silmer (Study Session)              | May 5, 2016    |
| I-6                                     | Anna Christensen (Study Session) (1 of 2) | May 5, 2016    |
| I-7                                     | Lucy Johnson (Study Session) (1 of 3)     | May 5, 2016    |
| I-8                                     | Lucy Johnson (2 of 3)                     | June 3, 2016   |
| I-9                                     | Tracy Barden                              | June 9, 2016   |

**Table A: List of Comments Received**

| <b>Comment Code</b> | <b>Signatory</b>          | <b>Date</b>   |
|---------------------|---------------------------|---------------|
| I-10                | Donald Leas               | June 9, 2016  |
| I-11                | Edric Guise               | June 10, 2016 |
| I-12                | Merritt Morris            | June 10, 2016 |
| I-13                | John McLareninsinc        | June 10, 2016 |
| I-14                | Steve Foley               | June 10, 2016 |
| I-15                | Debby McCormick           | June 11, 2016 |
| I-16                | Richard Miller            | June 11, 2016 |
| I-17                | Jack Simon                | June 12, 2016 |
| I-18                | Jake Jeffery              | June 12, 2016 |
| I-19                | Jeff Hoffman              | June 12, 2016 |
| I-20                | Carol Ostberg             | June 13, 2016 |
| I-21                | Lyle Nalli                | June 13, 2016 |
| I-22                | Lucy Johnson (3 of 3)     | June 13, 2016 |
| I-23                | Curt Russell              | June 14, 2016 |
| I-24                | David A. Koch             | June 14, 2016 |
| I-25                | Bill Kanter               | June 14, 2016 |
| I-26                | Erica Robinett (1 of 2)   | June 13, 2016 |
| I-27                | Charles Collins           | June 14, 2016 |
| I-28                | Jerry and Cheryl Jeffery  | June 14, 2016 |
| I-29                | Jerry Nulty               | June 14, 2016 |
| I-30                | Bruce Bradley             | June 9, 2016  |
| I-31                | Veronica A. Gates         | June 14, 2016 |
| I-32                | Amy Opheim                | June 14, 2016 |
| I-33                | Lisa Conner               | June 14, 2016 |
| I-34                | Gina Craig                | June 14, 2016 |
| I-35                | Joanne Nelson             | June 14, 2016 |
| I-36                | Kathy Magana-Gomez        | June 14, 2016 |
| I-37                | Patrick and Ricki Milne   | June 15, 2016 |
| I-38                | Susan Miller (1 of 4)     | June 15, 2016 |
| I-39                | Susan Miller (2 of 4)     | June 15, 2016 |
| I-40                | Susan Miller (3 of 4)     | June 15, 2016 |
| I-41                | Susan Miller (4 of 4)     | June 15, 2016 |
| I-42                | Jeff Miller               | June 15, 2016 |
| I-43                | Gene Simpson              | June 15, 2016 |
| I-44                | Aidan O'Neill             | June 15, 2016 |
| I-45                | Joseph P. O'Neill         | June 15, 2016 |
| I-46                | Melinda Cotton            | June 16, 2016 |
| I-47                | Ellen P. Mathis           | June 15, 2016 |
| I-48                | Denise Burrelli           | June 15, 2016 |
| I-49                | Anthony Burrelli          | June 15, 2016 |
| I-50                | Nikki Burrelli            | June 15, 2016 |
| I-51                | Jessica Payne             | June 16, 2016 |
| I-52                | Anna Christensen (2 of 2) | June 16, 2016 |
| I-53                | Lynne Cox                 | June 16, 2016 |
| I-54                | John W. McMullen          | June 17, 2016 |
| I-55                | Ron O'Brien               | June 6, 2016  |
| I-56                | Carol Hansen              | June 14, 2016 |

**Table A: List of Comments Received**

| <b>Comment Code</b> | <b>Signatory</b>        | <b>Date</b>   |
|---------------------|-------------------------|---------------|
| I-57                | Erica Robinett (2 of 2) | June 14, 2016 |

## **1.2 FORMAT OF RESPONSES TO COMMENTS**

Responses to each of the comment letters are provided on the following pages. The comment index numbers are provided in the upper right corner of each comment letter, and individual points within each letter are numbered along the right-hand margin of each letter. The City's responses to each comment letter immediately follow each letter and are referenced by the index numbers in the margins. The comments received during public meetings are organized by commenter and the entire public meeting transcript for the Planning Commission (May 5, 2016), Marine Advisory Commission (May 12, 2016), and the City Council (June 14, 2016) Study Sessions are included in Appendix A of this Final EIR for reference. An Errata section, with text revisions, has been prepared to provide corrections and clarifications to the Draft EIR where required.

## 2.0 COMMENT LETTERS AND RESPONSES

### 2.1 FREQUENT COMMENTS AND COMMON RESPONSES

The following responses have been prepared to address frequent and similar comments received on the Draft EIR. These comments and responses are provided prior to the individual comment letters from State agencies, local agencies, and interested individuals and are referenced throughout Section 2.0, Comment Letters and Responses, of this Final EIR.

**Common Comment 1:** A number of comments were made during the public review period for the Draft EIR that expressed concern related to the fact that the proposed Project would be providing 1,250 permanent indoor seats. These comments indicated that more seating was required for typical swim meets and events, and the suggested the number of seats was 1,500. Some commenters requested that up to 1,750 permanent seats should be provided in order to meet the needs of the aquatic community and to allow more events to be held at the pool.

**Common Response 1:** There are several organizations that set standards for aquatic events. FINA (Federation Internationale de Natation) is the international governing body of swimming, diving, water polo, synchronized swimming, and open water swimming. FINA specifies that for a World Championship, 2,000 spectator seats are required. USA Swimming requires 1,000 to 2,000 seats, specifically calling out 1,000 permanent and 500 temporary seats for National level meets. The NCAA (National Collegiate Athletic Association) is silent on spectator seating requirements.

The number of indoor seats for the proposed Project was determined through a collaborative process with a technical advisory stakeholder committee. The number of seats, which affects the size of the building and many of the design criteria (e.g., the number of restrooms required) was balanced with various project constraints and was considered and approved by the City Council as part of the baseline programmatic requirements for the Project. Therefore, the Project was designed with 1,250 indoor seats. It should be noted that in addition to the 1,250 seats that would be permanently located indoors at the proposed facility, the Project would allow for the addition of temporary seating for up to 3,000 spectators at the outdoor pool. Therefore, the Project would have the capability of using both pools with maximum seating for 4,250 spectators.

**Common Comment 2:** Several comments were received expressing concern regarding Alternative 3, which included placing the diving platforms outside to reduce the height of the main structure. The comments indicated that outdoor diving wells are not desirable for divers due to wind, sun, and other weather conditions that can create safety concerns.

**Common Response 2:** As described further in Chapter 5.0, Alternatives, of the Draft EIR, the California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of

the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (*State CEQA Guidelines*, Section 15126.6). Therefore, the purpose of the alternatives put forth in the Draft EIR, including Alternative 3, was to determine whether any of the potential impacts associated with the proposed Project could be reduced or eliminated through alternative designs. The City considered all of the Alternatives in order to ensure compliance with CEQA in exhausting all possible project alternatives that could meet the Project Objectives while also reducing impacts to the environment.

The site plan proposed under Alternative 3 would locate the diving well component outside in order to reduce the height of the Bubble structure. This would reduce visual impacts associated with the structure; however, a height variance would still be required. The Draft EIR determined that environmental impacts associated with Alternative 3 would be incrementally less than the proposed Project, with the exception of noise impacts, which would be greater. Despite incrementally reducing environmental impacts associated with the Project, Alternative 3 was determined to meet only a few of the Project Objectives, and to a lesser degree than the Project. For these reasons, Alternative 3 was not identified as the Environmentally Superior Alternative nor was Alternative 3 identified as the Preferred Alternative. Therefore, the City intends to proceed with the design as included under the proposed Project, which would locate the diving well inside the structure.

**Common Comment 3:** Several comments expressed concern that a mitigation measure was proposed that required special events, defined as events with 450 or more spectators, to prepare an Event Traffic Management Plan for review and approval by the City Traffic Engineer. The commenters indicated, based on their personal experiences at the former facility, that there was always sufficient parking in the adjacent public parking lots. Therefore, the comments requested removal of the mitigation measure requiring an Event Traffic Management Plan.

**Common Response 3:** Potential traffic impacts resulting from the proposed Project are described in the Section 4.12, Transportation and Traffic, of the Draft EIR. As described throughout this section, the proposed Project increases the pool square footage and would allow multiple user groups to be programmed concurrently throughout the day. In addition, one of the pools could remain open to the general public while a private event is using the other pool. As such, to analyze traffic impacts resulting from project implementation, operational traffic was doubled. Even with this conservative approach, the results of this analysis indicated that all study area intersections would operate at Level-of-Service (LOS) C or better in the future with new traffic generated by the Project. In addition, because events are scheduled throughout the day, increased concurrent programming would not necessarily affect traffic during the peak hours.

The proposed Project would provide 1,250 permanent seats for the indoor pool, and up to 3,000 temporary seats for the outdoor pool. No permanent outdoor spectator seating is included in the proposed Project. With typical average vehicle occupancy of 1.5 passengers per vehicle, an event with 450 spectators would be expected to generate 300 outbound trips, which is the same traffic volume that was analyzed in the weekend midday peak hour. Therefore, this threshold of 450 spectators, or 300 outbound trips, was chosen as a very conservative number for the definition of a large special event that would require an Event Traffic Management Plan. This plan may

include active traffic management and/or off-site parking and shuttles. Because special events are sporadic and would occur at specific times per year consistent with existing (pre-closure) conditions, the impacts of special event traffic would not cause significant peak-hour LOS impacts.

Mitigation Measure 4.12.1 was identified to reduce potential traffic impacts resulting from special events, and would require the preparation of an Event Traffic Management Plan for events with more than 450 spectators. Implementation of this measure was determined to reduce potential impacts associated with special events at the project site to a less than significant level.

It should be noted that special events at the former facility, and the temporary pool, require that an application be submitted to City staff. A special event is any permitted activity that requires extended hours of operation outside of regularly scheduled public hours or an event that requires the cancellation of regularly scheduled public hours. These events are permitted via request from the user group if time and space are available. Any event that requires cancellation of regularly scheduled programming must be authorized by the Bureau Manager of Community Recreation Services and the Director of Parks, Recreation, and Marine.

Parking for the proposed Project would continue to be provided by the two existing pay lots adjacent to the Project site: (1) the Belmont Veteran's Memorial Pier Parking Lot (Pier Parking Lot), and (2) the Beach Parking Lot. Both lots contain an approximate total of 1,050 public parking spaces. Although pool patrons would utilize these lots that are jointly used by visitors to the beach, pier and nearby retail/commercial uses, and are not solely designated for pool visitors.

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## 2.2 STATE OF CALIFORNIA

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**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-9140  
FAX (213) 897-1337  
www.dot.ca.gov

S-1



*Serious drought.  
Help save water!*

June 15, 2016

Mr. Craig Chalfant  
City of Long Beach  
333 West Ocean Boulevard, 5<sup>th</sup> Floor  
Long Beach, CA 90802

RE: Belmont Pool Revitalization Project  
Draft Environmental Impact Report  
SCH#2013041063; IGR#160431-FL  
Vic. LA 1/ PM 0.6

Dear Mr. Chalfant:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project includes the construction and operation of approximately 125,500 square feet pool complex that includes indoor and outdoor pool components and an approximately 1,500 square feet café. Permanent indoor seating for approximately 1,250 spectators, and temporary outdoor seating would be provided for larger events with a maximum seating capacity of up to 3,000 spectators.

S-1-1

The nearest State facility to the proposed project is SR-1. Caltrans does not expect project approval to result in direct adverse impact to the existing State transportation facilities.

S-1-2

Caltrans acknowledges that “in the event that a large special event is held at Belmont Pool, an Event Traffic Management Plan would need to be developed that addresses potential congestion and parking impacts,” and that “this plan may include active traffic management and/or off-site parking and shuttles.”

S-1-3

Caltrans continues to strive to improve its standards and processes to provide flexibility while maintaining the safety and integrity of the State’s transportation system. It is our goal to implement strategies that are in keeping with our mission statement, which is to “provide a safe, sustainable, integrated, and efficient transportation system to enhance California’s economy and livability.”

Good geometric and traffic engineering design to accommodate bicyclists and pedestrians are critical at every on and off ramp and freeway terminus intersection with local streets. Caltrans will work with the City to look for every opportunity to develop projects that improve safety and connectivity for pedestrians and bicyclists. Opportunities for improvements may exist on State facilities such as: freeway termini, on/off-ramp intersections, overcrossings, under crossings, tunnels, bridges, on both conventional state highways and freeways.

S-1-4

Mr. Craig Chalfant  
06/15/2016  
Page 2

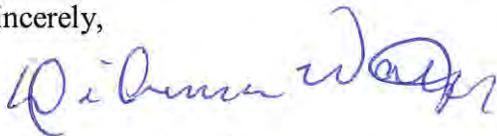
With regard to public transit, we recommend planning for gradual continual improvement of transit stops, bus bays, or other facilities, to accommodate traffic flow, especially on streets that are State Route locations or are near freeway intersections. | S-1-5

We want to remind you that transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Please limit large size truck trips to off-peak commute periods. | S-1-6

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful of your need to discharge clean run-off water and it is not permitted to discharge onto State highway facilities. | S-1-7

If you have any questions or concerns regarding these comments, please feel free to contact me at (213) 897 – 9140 or project coordinator Frances Lee at (213) 897-0673 or electronically at [frances.lee@dot.ca.gov](mailto:frances.lee@dot.ca.gov). | S-1-8

Sincerely,



DIANNA WATSON  
Branch Chief, Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

## **CALIFORNIA DEPARTMENT OF TRANSPORTATION- DISTRICT 7**

### **LETTER CODE: S-1**

**DATE: JUNE 15, 2016**

#### **RESPONSE S-1-1**

This comment thanks the City of Long Beach (City) for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed Project and briefly summarizes the primary Project components.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

#### **RESPONSE S-1-2**

This comment notes that the nearest Caltrans facility to the project site is State Route 1 (SR-1). The comment notes that Caltrans does not expect Project approval to result in a direct adverse impact to existing State transportation facilities.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

#### **RESPONSE S-1-3**

This comment acknowledges the requirement included in Section 4.12, Transportation and Traffic, of the Draft EIR to prepare an Event Management Plan in the event a large special event is held at the Belmont Pool.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

#### **RESPONSE S-1-4**

The comment expresses Caltrans's commitment to improve its standards and processes to provide flexibility while maintaining the safety and integrity of the State's transportation system. The comment goes on to note that it is Caltrans's goal to implement strategies that further its commitment to provide a sustainable, integrated, and efficient transportation system.

As part of this commitment to provide safe facilities and an efficient transportation system, Caltrans notes that good geometric and traffic engineering design to accommodate bicyclists and pedestrians is essential at every on- and off-ramp and freeway terminus intersection with local

streets. The comment goes on to note that Caltrans will continue to coordinate with the City to look for opportunities to develop projects that promote bicyclist and pedestrian safety. Caltrans notes that opportunities for such improvements may exist on State facilities.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

#### **RESPONSE S-1-5**

This comment recommends planning for the gradual implementation of improvements to transit stops, bus bays, and other transportation facilities to accommodate traffic flow on streets that are State routes or are near freeway facilities.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

#### **RESPONSE S-1-6**

This comment is intended to remind the City that heavy construction equipment and/or materials that may require the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. The comment also notes that large size truck trips, should they be required by the Project, should be limited to off-peak commute hours.

As previously stated, there are no State facilities within the vicinity of the Project site. As such, it would be unlikely that the Project would require the transfer of oversized materials on vehicles requiring a transportation permit from Caltrans. In the unlikely event such a permit would be necessary, the City would take all necessary precautions to obtain such a permit from Caltrans prior to transporting any materials on an oversized-transport vehicle on Caltrans roadway facilities. No further response is necessary.

#### **RESPONSE S-1-7**

This comment notes that stormwater runoff is a sensitive issue for Los Angeles and Ventura Counties, and as such, reminds the City to be mindful to discharge clean runoff. The comment also notes that discharging runoff from the site is not permitted onto State facilities.

Runoff from the Project site during Project construction and operation is addressed in Section 4.8, Hydrology and Water Quality, of the Draft EIR. As described throughout this section, the Project would result in less than significant impacts with respect to runoff and its potential impact on water quality with mitigation incorporated. Furthermore, as previously noted, there are no Caltrans facilities within the vicinity of the Project site. Therefore, the Project is not anticipated to discharge runoff on any State facilities.

### **RESPONSE S-1-8**

This comment provides contact information for the author of the comment letter should the City have any questions or concerns related to Comments S-1-1 through S-1-8.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
200 Oceangate, Suite 1000  
Long Beach, CA 90802-4302  
(562) 590-5071



June 16, 2016

Craig Chalfant, Senior Planner  
City of Long Beach  
Development Services/Planning Bureau  
333 W. Ocean Boulevard, 5<sup>th</sup> Floor  
Long Beach, CA 90802

**RE: Belmont Pool Project, City of Long Beach  
Comments on Draft Environmental Impact Report**

Dear Mr. Chalfant:

In response to the Notice of Availability of a Draft Environmental Impact Report (DEIR) for the Belmont Pool Project, California Coastal Commission staff concurs that an EIR is necessary for the proposed project and requests that the Final EIR consider alternative project designs and project locations which may reduce or avoid adverse impacts to visual resources and public access, and which consider the potential impacts of sea level rise.

S-2-1

According to the Notice, the proposed project includes the construction of a 125,500 square foot pool complex including indoor and outdoor components and a 1,500 square foot café on top of the public beach in the same area that previously supported the Belmont Pool (1968-2014).

Commission staff has determined that the area on which the pool complex is proposed is within a portion of the coastal zone that is subject to the requirements of the City of Long Beach certified Local Coastal Program (LCP), and is also partially within the Commission's area of original jurisdiction. Therefore, the proposed project will require a local coastal development permit from the City and a coastal development permit from the Coastal Commission.

S-2-2

The Final EIR should analyze the project for consistency with the policies of both the certified LCP and the Coastal Act (including Sections 30210, 30211, 30212, 30251, and 30253), and provide mitigation or alternatives for any identified impacts to visual resources, public access and recreation, and potential hazards. Specifically Commission staff recommends that the Final EIR analyze the following coastal issues:

- Visual resource impacts of the project from vantage points along the public beach and from Ocean Boulevard, which the Draft EIR identifies as a designated scenic roadway – does the project preserve or enhance identified view corridors and is the project consistent with the height limit identified in the LCP? Would an alternative project design or location serve to preserve or enhance visual resources?

S-2-3

Belmont Pool Project, City of Long Beach  
Coastal Commission Staff Comments on DEIR  
Page 2 of 2

- The Wave Uprush Study included in the Draft EIR indicates that “the high sea level rise projections for 2100 would have a significant impact on the facility. Both the project site as well as much of the Long Beach Peninsula and Belmont Shore would be exposed to coastal flooding. Although the proposed design sets the main pool deck elevation at +17’ (above the projected run-up/still water elevation of +10.4’), the lower level of the building (pool equipment and storage) as well as the entire site, parking and vicinity would be below the projected water line.” Given the potential impacts caused by sea level rise over the expected life of the project – under low, medium, and high sea level rise scenarios, considering astronomical tides and potential wave uprush, will the structure require a shoreline protective device in the future? Will the primary pool structure itself serve as a shoreline protective device in the future (e.g. could the foundational elements become exposed and contribute to beach erosion or restrict lateral public access along the public beach? Would an alternative project design serve to prevent the primary structure from acting as a shoreline protective device? Would an alternative location serve to prevent the pool complex from being regularly flooded in the future? Please amend the Wave Uprush Study to include an analysis of all feasible alternative locations that could accommodate the pool complex (including but not limited to the three sites identified in the DEIR) and indicate whether such locations are subject to wave uprush/hazards over the expected life of the pool complex. S-2-4  
S-2-5  
S-2-6
- The Draft EIR indicates that the existing bicycle and pedestrian paths might be relocated to make room for the pool complex. Is there adequate space to relocate the paths, considering existing beach use activities in the area and future impacts caused by sea level rise? S-2-7

Each of the issues identified in this letter, as well as other environmental impacts identified in the Draft EIR, should be analyzed in the context of potential alternative project designs and project locations. Could adverse impacts to visual resources, potential beach erosion, loss of public access, and risk of damage to the pool complex be reduced or eliminated if the design or location of the project was changed? S-2-8

Please note that the comments provided herein are preliminary in nature. More specific comments may be appropriate as the project develops. Coastal Commission staff requests notification of any future activity associated with this project or related projects. Additionally, the comments contained herein are those of Coastal Commission staff only and should not be construed as representing the opinion of the Coastal Commission itself. Thank you for the opportunity to comment on the Draft EIR. S-2-9

Sincerely,

  
Zach Rehm  
Coastal Program Analyst

**CALIFORNIA COASTAL COMMISSION  
LETTER CODE: S-2**

**DATE: June 16, 2016**

**RESPONSE S-2-1**

This comment is introductory in nature and states the California Coastal Commission's (Coastal Commission) concurrence with the decision to prepare an Environmental Impact Report (EIR) for the proposed Project. This comment requests that the Final EIR consider alternatives that would reduce or avoid impacts related to visual resources, public access, and sea level rise. Chapter 5.0, Alternatives, of the Draft EIR includes a complete analysis of several Alternatives that would have reduced the height of the building, thereby reducing visual impacts. Public access will be retained and enhanced on the Project site under the proposed Project due to the extensive open space and walkways that traverse all sides of the facility. Public access to the site and the beach has not been reduced or restricted. It should be noted that the base of the building has been elevated 7 feet (ft) to account for sea level rise.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE S-2-2**

This comment notes that the Project site is within a portion of the Coastal Zone that is subject to the Long Beach certified Local Coastal Program (LCP) and is within the Coastal Commission's area of original jurisdiction. The comment further states that the proposed Project would require Coastal Development Permits (CDPs) from both the City of Long Beach (City) and the Coastal Commission.

The commenter is correct in asserting that a portion of the project site is located within an area regulated by the Coastal Commission. As described further in Section 4.9, Land Use and Planning, of the Draft EIR, the Project site includes areas within the Tidelands and submerged lands (Draft EIR, page 4.9-19). As such, the Coastal Commission retains jurisdiction over the approval of a CDP for the portion of the Project site located within the Tidelands and submerged lands; the City retains jurisdiction over the approval of a CDP for the remainder of the site. It should be noted that in September 2014, the City adopted a resolution (Resolution-14-0088) indicating that staff intends to process a Consolidated Coastal Development Permit Application (CCDP), consistent with Section 30601.3 of the Public Resources Code (Coastal Act). The Coastal Act authorizes the California Coastal Commission to process a CCDP when requested by a local jurisdiction for a project that would otherwise require a CDP from both entities.

Section 4.9, Land Use and Planning, of the Draft EIR, also includes a consistency analysis demonstrating the Project's consistency with the City's LCP and the California Coastal Act (Coastal Act).

### **RESPONSE S-2-3**

This comment notes that the Final EIR should analyze the proposed Project's consistency with the policies included in the LCP and the Coastal Act and provide mitigation where needed. The commenter expresses concerns regarding visual impacts from the public beach and Ocean Boulevard. The commenter further questions the height limit defined in the LCP as compared to the proposed Project. This comment also inquires if an alternative project design or location would preserve or enhance visual resources when compared to the proposed Project.

As described in Response S-2-3, Section 4.9, Land Use and Planning, of the Draft EIR, includes a consistency analysis demonstrating the Project's consistency with the City's LCP and the Coastal Act.

Visual impacts resulting from Project construction and implementation, including the obstruction or degradation of views from public vantage points (including the beach and Ocean Boulevard) are addressed in Section 4.1, Aesthetics, of the Draft EIR. As discussed in Section 4.1, Aesthetics, views of the ocean from nearby roadways and public sidewalks would be improved as compared to the previous pool facilities because the new pool has been designed to be narrower and the elliptical shape would slope in height at the edges of the building (refer to Figure 4.1.4, Pre- and Post-Project Building Orientation). While the maximum height for the proposed Project is 19 ft higher than the previous Belmont Pool building, the sloping shape of the proposed Project would reduce the bulk and massing of the new facility in comparison to the former facility which was characterized by a consistent roof line that maintained the maximum height throughout the entire length of the building. Further, the proposed Project would enhance the visual quality of the Project site by constructing a new building and introduce an enhanced architecture with upgraded landscaping. Preservation of the scenic coastal character is consistent with the objectives of the California Coastline Preservation and Recreation Plan. Therefore, the proposed Project would be consistent with Coastal Act Section 30251.

While the proposed Project was determined to have less than significant impacts with respect to aesthetics, an alternative project design or location could preserve or enhance visual resources when compared to the proposed Project. As described in Chapter 5.0, Alternatives, Alternatives 1 through 5 would all result in reduced visual impacts. However, despite incrementally reducing visual impacts, these alternatives were determined to meet only a few of the Project Objectives, or meet the objectives to a lesser degree than the Project. Therefore, none of these alternatives were identified as the Environmentally Superior Alternative or the Preferred Alternative. Therefore, the City intends to proceed with the design as included under the proposed Project.

### **RESPONSE S-2-4**

This comment acknowledges the analysis of sea level rise included in the Draft EIR and questions if the proposed Project would require a shoreline protective device in the future.

Impacts with respect to sea level rise (SLR) are addressed in Section 4.6, Global Climate Change, of the Draft EIR. It should be noted that the base of the building has been designed and elevated

by 7 ft to account for sea level rise. As discussed in this section and in the *Wave Uprush Study*<sup>1</sup> prepared for the proposed Project, wave run-up for the high 2060 and 2100 sea level rise scenarios would result in a run-up elevation up to 8.2 ft and 10.4 ft (or greater) at the Project site. Without preventative measures, the upper 2100 sea level rise estimate would not only inundate much of the pool facility, but much of the Long Beach Peninsula and Belmont Shore as well. This 2100 condition is not a result of the Project but rather the result of the projected worst-case sea level rise and erosion conditions.

The main pool deck would be elevated 17 ft amsl, which would be set 8.8 ft above the projected high water levels in 2060. The lower level of the building (pool equipment and storage) and associated parking areas would be below the projected water line in 2060; however, this area would not be open for public use, and therefore, would not subject visitors to the Project site to significant cumulative impacts related to sea level rise. Furthermore, additional GHG reduction strategies implemented at the State, national, and international levels could reduce sea-level rise between now and the year 2100. Therefore, the proposed Project would not be adversely impacted by sea level rise due to climate change, and no mitigation is required.

#### **RESPONSE S-2-5**

The commenter inquires if the primary pool structure will serve as a shore protective device in the future. The comment makes specific reference to the possible exposure of foundational elements that could contribute to beach erosion or restrict lateral public access along the public beach.

See Response S-2-4, above. There is no provision in the *State CEQA Guidelines* that indicates that CEQA requires an evaluation of existing environmental conditions at the project site that may cause significant adverse impacts to visitors to the project site. However, CEQA does mandate that an analysis of a project's impacts consider whether the project might cause existing environmental hazards to worsen. For this reason, the potential impacts with respect to beach erosion are analyzed in the *Wave Uprush Study* prepared for the Project. As discussed in this report, the modeled 100-year storm would erode 18 to 48 percent of the beach berm in 2060. The modeled 100-year storm would erode 30 percent in the low scenario for 2100, but erosion under the high scenario would pose more of a serious threat to the pool structure than wave run-up. This projected erosion may also be exacerbated by smaller erosional events (e.g., 5-year, 10-year, 25-year scenarios, etc.) The western portion of the site is more vulnerable than the remainder of the site because it is 40 to 50 ft closer to the shoreline. While the western portion of the site is more vulnerable to erosion than the rest of the site, the proposed building will not affect erosion at the adjacent beaches until the berm fronting the building erodes away. As described throughout the *Wave Uprush Study*, there is approximately 50 ft of berm remaining under the highest sea level rise and all breakwater scenarios. Furthermore, the structure is not impounding sand (i.e., it is not preventing sand from entering the coastal littoral zone for sand transport along the coast). Therefore, the primary structure would not contribute to beach erosion or restrict lateral public access along the public beach.

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<sup>1</sup> Moffatt & Nichol 2014, *Wave Uprush Study* for Belmont Pool Plaza. October.

The proposed foundation will consist of deep piles to support a system of beams and vertical structures to support the pool, walls, floors, and roof structures. The piles will be constructed very deep (below grade) so they will not be exposed to wave activity. The exposed portion of the foundation will be the vertical walls, stairs, or other structures that are vertically supported by the underground piles. The exposed portions will act as a barrier to water flow, including wave activity, should waves reach the structure in an uprush scenario. Unless there are unreasonable amounts of erosion (which as described previously, is not expected at the site), the building will behave more like a wall than a pier, since the piles would not become exposed. Therefore, the proposed Project would not require the use of shoreline protective devices nor would the primary pool structure serve as a shoreline protective device protecting the remainder of the Project.

#### **RESPONSE S-2-6**

This comment inquires if alternative locations would prevent regular flooding of the proposed Project in the future. The comment requests that the *Wave Uprush Study* is amended to include analysis of alternative project locations.

As stated above, Section 5.0, Alternatives of the Draft EIR contains a complete analysis of alternative sites for the proposed Project. As explained on Draft EIR Page 5-8, funding for the proposed Project is entirely sourced from the Tidelands Operating Fund, an umbrella fund that allocates expenditures for Tidelands operations and capital improvements projects within the Tidelands area of the City. Tidelands are defined as those lands and water areas along the coast of the Pacific Ocean seaward of the ordinary high tide line to a distance of 3 miles. The Tidelands Trust not only restricts the use of the Tidelands, but also restricts the use of income and revenue generated from businesses and activities conducted on the Tidelands to be used solely for projects within the Tidelands area. Because the proposed Project is dependent on funding from the Tidelands Operating Fund, any alternative location not in the Tidelands would have to be funded through alternative sources. Due to a lack of available finances from other City sources, a project that would not be funded by the Tidelands Operating Fund would not be economically feasible. Therefore, all three alternative sites were located in the Tidelands. Additionally, according to the City, no other properties within the City's Tidelands would be large enough or are currently available to be considered as an alternative location. Furthermore, the primary objective of the Project is to replace the former facility in its original location. Therefore, it is not fiscally prudent to amend the *Wave Uprush Study* to consider alternative locations which have been determined infeasible. It should also be noted that the proposed Project was initiated prior to the demolition and removal of the old facility, as it has long been the City's intention to replace the old facility on the same site.

#### **RESPONSE S-2-7**

This comment questions the relocation of the existing bicycle and pedestrian paths under the proposed Project. The comment further questions if there is adequate space for relocation of the paths due to existing beach activities and future sea level rise.

The proposed relocation of the bicycle and pedestrian path bordering the southern portion of the site has been completed under a separate project.<sup>1</sup> Therefore, there is adequate space for the pathway and existing beach activities on this stretch of Long Beach's coastline.

#### **RESPONSE S-2-8**

This comment requests that impacts identified in this comment letter and the Draft EIR are analyzed in the context of alternative project designs and locations.

Alternative designs and locations are analyzed in Chapter 5.0, of the Draft EIR. As described in this chapter of the Draft EIR, an alternative project design or location could lessen potential environmental impacts when compared to the proposed Project. However, these alternatives were determined to meet only a few of the Project Objectives, or meet the objectives to a lesser degree than the Project. Therefore, none of these alternatives were identified as the Environmentally Superior Alternative or the Preferred Alternative. In addition, the EIR has addressed and analyzed all feasible alternative locations within the City's Tidelands area (see Response S-2-6). Consequently, the City intends to proceed with the design as included under the proposed Project.

#### **RESPONSE S-2-9**

This comment is conclusory in nature and notes that the Coastal Commission staff requests notification of future activity associated with the proposed Project.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

---

<sup>1</sup> Press Telegram, Long Beach Coastline Pedestrian Path to Be Unveiled. Website: <http://www.presstelegram.com/environment-and-nature/20150529/long-beach-coastline-pedestrian-path-to-be-unveiled> (accessed July 21, 2016).

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EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

June 17, 2016

Craig Chalfant  
City of Long Beach  
333 W. Ocean Boulevard, 5th Floor  
Long Beach, CA 90802

Subject: Belmont Pool Revitalization Project  
SCH#: 2013041063

Dear Craig Chalfant:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 16, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

S-3-1

**SCH#** 2013041063  
**Project Title** Belmont Pool Revitalization Project  
**Lead Agency** Long Beach, City of

**Type** EIR Draft EIR  
**Description** Note: Review Per Lead

The proposed project would replace the former Belmont Pool facility and provide the City with a revitalized and modern pool complex. The project proposes the construction and operation of an approximately 125,500 sf pool complex that includes indoor and outdoor pool components and an approximately 1,500 sf cafe. Permanent indoor seating for approximately 1,250 spectators would be provided to view competitive events at the 50-Meter Competition Pool and the Dive Pool. Temporary outdoor seating would be provided for larger events at the Outdoor 50-Meter Competition Pool with a max seating capacity of up to 3,000 spectators. The proposed project does not include any permanent outdoor seating designed for spectator viewing.

**Lead Agency Contact**

**Name** Craig Chalfant  
**Agency** City of Long Beach  
**Phone** 562-570-6368 **Fax**  
**email**  
**Address** 333 W. Ocean Boulevard, 5th Floor  
**City** Long Beach **State** CA **Zip** 90802

**Project Location**

**County** Los Angeles  
**City** Long Beach  
**Region**  
**Lat / Long** 33° 45' 28.6" N / 118° 8' 44.4" W  
**Cross Streets** 43rd Place/Bennett Ave  
**Parcel No.** 7256-039-903  
**Township**

|  | Range | Section | Base |
|--|-------|---------|------|
|--|-------|---------|------|

**Proximity to:**

**Highways** SR-1  
**Airports**  
**Railways**  
**Waterways** Alamitos Bay, Pacific Ocean, Colorado Lagoon  
**Schools** Various  
**Land Use** Z: Park & Belmont Pier Planned Development District (PD-2)  
GP=No. 7 Mixed Use & LUD No. 11, Open Space and Park

**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

**Reviewing Agencies** Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

Document Details Report  
State Clearinghouse Data Base

S-3

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*Date Received* 04/13/2016      *Start of Review* 04/13/2016      *End of Review* 06/16/2016

DEPARTMENT OF TRANSPORTATION  
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-9140  
FAX (213) 897-1337  
www.dot.ca.gov

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JUN 15 2016

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JUN 15 2016

STATE CLEARINGHOUSE

June 15, 2016

Mr. Craig Chalfant  
City of Long Beach  
333 West Ocean Boulevard, 5<sup>th</sup> Floor  
Long Beach, CA 90802

RE: Belmont Pool Revitalization Project  
Draft Environmental Impact Report  
SCH#2013041063; IGR#160431-FL  
Vic. LA 1/ PM 0.6

Dear Mr. Chalfant:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project includes the construction and operation of approximately 125,500 square feet pool complex that includes indoor and outdoor pool components and an approximately 1,500 square feet café. Permanent indoor seating for approximately 1,250 spectators, and temporary outdoor seating would be provided for larger events with a maximum seating capacity of up to 3,000 spectators.

Attachment 1

The nearest State facility to the proposed project is SR-1. Caltrans does not expect project approval to result in direct adverse impact to the existing State transportation facilities.

Caltrans acknowledges that "in the event that a large special event is held at Belmont Pool, an Event Traffic Management Plan would need to be developed that addresses potential congestion and parking impacts," and that "this plan may include active traffic management and/or off-site parking and shuttles."

Caltrans continues to strive to improve its standards and processes to provide flexibility while maintaining the safety and integrity of the State's transportation system. It is our goal to implement strategies that are in keeping with our mission statement, which is to "provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability."

Good geometric and traffic engineering design to accommodate bicyclists and pedestrians are critical at every on and off ramp and freeway terminus intersection with local streets. Caltrans will work with the City to look for every opportunity to develop projects that improve safety and connectivity for pedestrians and bicyclists. Opportunities for improvements may exist on State facilities such as: freeway termini, on/off-ramp intersections, overcrossings, under crossings, tunnels, bridges, on both conventional state highways and freeways.



Mr. Craig Chalfant  
06/15/2016  
Page 2

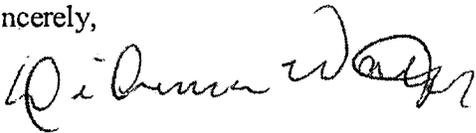
With regard to public transit, we recommend planning for gradual continual improvement of transit stops, bus bays, or other facilities, to accommodate traffic flow, especially on streets that are State Route locations or are near freeway intersections.

We want to remind you that transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Please limit large size truck trips to off-peak commute periods.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful of your need to discharge clean run-off water and it is not permitted to discharge onto State highway facilities.

If you have any questions or concerns regarding these comments, please feel free to contact me at (213) 897 – 9140 or project coordinator Frances Lee at (213) 897-0673 or electronically at [frances.lee@dot.ca.gov](mailto:frances.lee@dot.ca.gov).

Sincerely,



DIANNA WATSON  
Branch Chief, Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

↑  
Attachment 1

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**STATE CLEARINGHOUSE AND PLANNING UNIT  
LETTER CODE: S-3**

**DATE: June 17, 2016**

**RESPONSE S-3-1**

This comment is introductory and indicates that the State Clearinghouse submitted the Draft Environmental Impact Report (EIR) for the proposed Project to selected State agencies for review. It further indicates that comments from the reviewing agency are enclosed. The enclosed comment letter is a duplicate of the California Department of Transportation (Caltrans) letter responded to in this Response to Comments document as Letter S-2. The comment states that the lead agency has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to the California Environmental Quality Act (CEQA).

This comment does not contain any substantive statements or questions about the environmental analysis or conclusions contained in the Draft Supplemental EIR or the analysis therein. Refer to Comment Letter S-2 for responses to comments made by Caltrans (Attachment 1 of this letter). This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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## **2.3 LOCAL AGENCIES/UTILITY PROVIDERS**

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# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
Telephone: (562) 699-7411, FAX: (562) 699-5422  
www.lacsd.org

GRACE ROBINSON HYDE  
Chief Engineer and General Manager

May 27, 2016

Ref File No.: 3690701

Mr. Craig Chalfant, Senior Planner  
Development Services Department  
City of Long Beach  
333 West Ocean Boulevard, 5<sup>th</sup> Floor  
Long Beach, CA 90802

Dear Mr. Chalfant:

### Comment Letter for the Belmont Pool Revitalization Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on April 13, 2016. The proposed development is located within the jurisdictional boundaries of District No. 3. We offer the following comments and updates:

L-1-1

#### 4.13 UTILITIES AND SERVICE SYSTEMS

1. *Page 4.13-7*, first paragraph under **Wastewater** – The Joint Water Pollution Control Plant currently processes an average flow of 258.4 million gallons per day (mgd).
2. *Page 4.13-7*, second paragraph under **Wastewater** – The proposed Project is located within the jurisdictional boundaries of District 3.
3. *Page 4.13-7*, third paragraph under **Wastewater** – The 51-inch diameter Joint Outfall C Unit 3D Trunk Sewer conveyed a peak flow of 12.2 mgd when last measured in 2013.
4. *Page 4.13-24*, first paragraph under **Wastewater** – The 51-inch diameter Joint Outfall C Unit 3D Trunk Sewer conveyed a peak flow of 12.2 mgd when last measured in 2013.
5. *Page 4.13-33*, first paragraph under **Wastewater** – The information states that “LACSD uses United States Census Bureau population information with population projections, as well as current land use and build out or zoned land use to project current and future wastewater flows”. The Districts use actual flowrates and population data from the California Department of Finance and Census Bureau to estimate per capita generation of sewerage. Population projections from SCAG (Southern California Association of Governments) and estimated per capita generation of sewage are then used to project future wastewater flow. The capacity of District facilities are routinely monitored relative to projected needs, and capacity increase projects are undertaken as needed to meet SCAG’s population projections.

L-1-2

L-1-3

L-1-4

L-1-5

L-1-6

Mr. Craig Chalfant

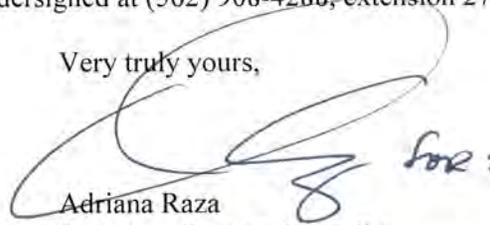
-2-

May 27, 2016

- 6. Previous comments submitted by the Districts in correspondence dated May 6, 2016 (copy enclosed) still apply to the subject project. | L-1-7
- 7. All other information concerning Districts' facilities and sewerage service contained in the document is current. | L-1-8

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

Enclosure

cc: L. Shadler  
M. Sullivan  
M. Tatalovich



## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
 Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
 Telephone: (562) 699-7411, FAX: (562) 699-5422  
[www.lacsd.org](http://www.lacsd.org)

GRACE ROBINSON HYDE  
 Chief Engineer and General Manager

May 6, 2014

Ref File No.: 2942490

Mr. Craig Chalfant  
 Planning Bureau  
 Development Services Department  
 City of Long Beach  
 333 West Ocean Boulevard, 5<sup>th</sup> Floor  
 Long Beach, CA 90802

Dear Mr. Chalfant:

### **Belmont Pool Revitalization Project**

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on April 9, 2014. The proposed development is located within the jurisdictional boundaries of District No. 3. We offer the following comments regarding sewerage service:

1. The proposed project may require a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section at extension 2900, in order to reach a determination on this matter. If this permit is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction. For additional Industrial Wastewater Discharge Permit information, go to [http://www.lacsd.org/wastewater/industrial\\_waste/permit.asp](http://www.lacsd.org/wastewater/industrial_waste/permit.asp).
2. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to either or both the Districts' Anaheim Street Trunk Sewer, located in 11<sup>th</sup> Street at Orange Avenue, or the Joint Outfall C Unit 3D Trunk Sewer, located in 11<sup>th</sup> Street at Belmont Avenue. The 36-inch diameter Anaheim Street Trunk Sewer has a design capacity of 19.7 million gallons per day (mgd) and conveyed a peak flow of 5.7 mgd when last measured in 2012. The 51-inch diameter Joint Outfall C Unit 3D Trunk Sewer has a design capacity of 29.2 mgd and conveyed a peak flow of 12.2 mgd when last measured in 2013.
3. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 mgd and currently processes an average flow of 263.7 mgd.
4. The expected increase in average wastewater flow from the project site is 19,322 gallons per day. For a copy of the Districts' average wastewater generation factors, go to [www.lacsd.org](http://www.lacsd.org).

Attachment 1

Mr. Craig Chalfant

-2-

May 6, 2014

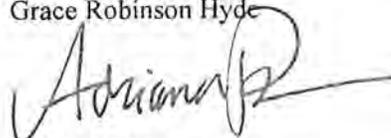
Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

5. 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 attributable to a particular parcel or operation already connected. 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 be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.
6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' 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 Districts' 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 the Districts' 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 you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

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

Very truly yours,

Grace Robinson Hyde



Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar

cc: L. Shadler  
M. Tremblay  
J. Ganz

**LOS ANGELES COUNTY SANITATION DISTRICT  
LETTER CODE: L-1**

**DATE: May 27, 2016**

**RESPONSE L-1-1**

This comment is introductory in nature and notes that the proposed Project is located within the jurisdictional boundaries of District 3 of the Los Angeles County Sanitation District (LACSD).

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE L-1-2**

This comment notes that Page 4.13-7 of the Utilities section of the Draft EIR should be revised to indicate that the Joint Water Pollution Control Plant (JWPCP) currently processes an average of 258.4 million gallons per day (mgd).

This change will be incorporated in the Errata to the Final EIR and does not change the analysis or conclusions contained in the Draft EIR. Therefore, no further response is necessary.

**RESPONSE L-1-3**

This comment notes that Page 4.13-7 of the Utilities section of the Draft EIR should be revised to state that the Project site is located within the jurisdictional boundaries of District 3 of the LASCSD.

This change will be incorporated in the Errata to the Final EIR and does not change the analysis or conclusions contained in the Draft EIR. Therefore, no further response is necessary.

**RESPONSE L-1-4**

This comment notes that Page 4.13-7 of the Utilities section of the Draft EIR should be revised to state that the 51-inch diameter Joint Outfall C Unit 3D Trunk System conveyed a peak flow of 12.2 mgd when last measured in 2013.

This change will be incorporated in the Errata to the Final EIR and does not change the analysis or conclusions contained in the Draft EIR. Therefore, no further response is necessary.

**RESPONSE L-1-5**

This comment notes that Page 4.13-24 of the Utilities section of the Draft EIR should be revised to state that the 51-inch diameter Joint Outfall C Unit 3D Trunk System conveyed a peak flow of 12.2 mgd when last measured in 2013.

This change will be incorporated in the Errata to the Final EIR and does not change the analysis or conclusions contained in the Draft EIR. Therefore, no further response is necessary.

#### **RESPONSE L-1-6**

This comment notes that Page 4.13-33 of the Utilities Section of the Draft EIR states that, “LACSD uses United States Census Bureau population information with population projections, as well as current land use and build out or zone land use to project current and future wastewater flows.” The comment goes on to affirm that while the LACSD utilizes population information from the United States Census Bureau, the LACSD also utilizes actual flowrates and population data from the California Department of Finance to estimate per capita generation of sewage. Additionally, the comment notes that population projects provided by the Southern California Association of Governments (SCAG) and estimated per capita generation of sewage are utilized to project future wastewater flow. Additionally, the comment indicates that LACSD facilities are routinely monitored relative to project needs, and capacity increase projects are undertaken on an as-needed basis to meet SCAG’s population projections.

This change will be incorporated in the Errata to the Final EIR and does not change the analysis or conclusions contained in the Draft EIR. Therefore, no further response is necessary.

#### **RESPONSE L-1-7**

This comment notes that comments previously submitted by the LACSD on May 6, 2014, in response to the Notice of Preparation for the proposed Project remain applicable to the Draft EIR. These comments are included as Attachment 1 and can be summarized as follows:

- (1) The Project may require a permit for Industrial Waste Discharge.
- (2) Wastewater originating from the Project will discharge into a local sewer line, which is not maintained by LACSD, for conveyance to either the Anaheim Street Trunk Sewer or the 51-inch diameter Joint Outcall C Unity 3D Trunk Sewer. The capacity of each of these sewers is 19.7 mgd with a conveyed peak flow of 5.7 mgd and 29.2 mgd with a conveyed peak flow of 12.2 mgd when last measured in 2013.
- (3) Wastewater generated by the Project will be treated at the JWPCP, which has a design capacity of 400 mgd and currently processes 263.7 mgd.
- (4) The expected increase in wastewater flow from the project is 19,322 gallons per day (gpd) based on the LACSD generation factors.
- (5) LACSD charges a fee for connecting to the District’s Sewage System for increasing the strength and/or quantity of wastewater attributable to a parcel or operation already connected.

- (6) The design capacities of the LACSD wastewater treatment facilities are based on growth forecasts provided by SCAG.

Information outlined in the comment letter submitted by LACSD is outlined in the “Scoping Process” and the “Existing Environmental Setting” subsections of Section 4.13, Utilities, of the Draft EIR.

**RESPONSE L-1-8**

This comment notes that all other information regarding LACSD facilities and sewage service in the document is current.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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## 2.4 INTERESTED PARTIES

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Monday, April 18, 2016 8:21 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont Pool

Include with DEIR comments.

Dino, do you want to be copied on all comment transmittals?

**From:** James Lent [<mailto:j2lent@verizon.net>]  
**Sent:** Monday, April 18, 2016 8:09 AM  
**To:** Craig Chalfant  
**Subject:** Belmont Pool

Having sat at virtually all of the public meetings from the beginning I would like to state a couple concerns:

With the idea that this structure should be around 50 years from completion and knowing that sea levels will rise apx 3 ft by 2025 I would suggest that the site level be 10 feet and not 5 feet above base grade. I-1-1

The architect has called out the use of what looks like treated wood on part of the exterior. I would highly suggest the use of Trex or other composite on any non load bearing surface due to the exposure to moisture and the elements. I have a 100 ft long fence that I made using Trex apx 10 years ago and its still in the same condition as when installed. I am 1 block in one direction and 5 in another from the water. Even treated woods seems to get termites after 5-7 years. Exposed load bearing surfaces should not be steel. Note the damage done to the shade structure at the Bola Chica beach. I-1-2

My last concern is the moveable floor. As a handicapped person that uses the pool I do understand the need to walk into the pool and walk in 4-5 ft water; however a moveable floor is just going to break at some point which will add operating expense. That said I would like to see one pool with a portion at a 4 to 7 ft level. With the old pool, at times there were almost to many people in the shallow end at the same time there were openings at the deep end which was 2/3 of the pool. See what the architect can come up with. In the long run it will save the city money. I-1-3

Thank you

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## **JAMES LENT**

### **LETTER CODE: I-1**

**DATE: April 18, 2016**

#### **RESPONSE I-1-1**

This comment begins by stating that the proposed structure should be 50 years from completion and asserts that sea levels will rise by approximately 3 feet (ft) by 2025. As such, the commenter recommends that the site level be 10 ft rather than 5 ft above base grade.

As described in Section 4.6, Global Climate Change, of the Draft Environmental Impact Report (EIR), a *Wave Uprush Study* was prepared for the proposed Project (Moffat & Nichol, October 2014) (Appendix B). As part of this study, sea level rise was estimated at the Project site for the horizon years of 2060 and 2100. As described in this report, sea level rise is projected to reach a maximum level of 2.6 ft in 2060, which would result in a run-up elevation of 8.2 ft at the Project site in 2060. Therefore, while sea level rise was not projected for the year 2035, the projected maximum sea level rise associated with the horizon year 2060 would still be less than the 3 ft estimation in the year 2025.

The main pool deck would be elevated 17 ft above mean sea level (amsl), which would be set 8.8 ft above the projected high water levels in 2060. The lower level of the building (pool equipment and storage) and associated parking areas would be below the projected water line in 2060; however, this area would not be open for public use, and therefore, would not subject visitors to the Project site to significant cumulative impacts related to sea level rise. Furthermore, additional greenhouse gas (GHG) reduction strategies implemented at the State, national, and international levels could reduce sea-level rise between now and the year 2100. Therefore, the proposed Project would not be adversely impacted by sea level rise due to climate change, and no mitigation is required.

#### **RESPONSE I-1-2**

The comment notes the proposed use of treated wood on the exterior of the pool facility. The commenter speaks from personal experience in recommending the use of Trex or another composite on non-load-bearing surfaces to minimize maintained costs associated with the exposure of treated wood to the natural coastal elements. The commenter also recommends against the use of steel on any exposed load-bearing surfaces associated with the proposed Project, citing the example of damage to the shade structure at Bolsa Chica Beach.

The proposed Project does not include the use of wood, treated or otherwise. Materials used on the Project will be wood-like where applicable (e.g., benches, first and second floor mezzanines, and the western screen or ship wall) and will be composite, synthetic, or other non-wood materials. In addition, any exposed steel structure, specifically any structure supporting the bubble, will be either stainless steel or treated with high performance base prime coatings that will protect the steel from corrosion, while the top coats of high performance synthetics will protect the prime coat and provide the color and sheen desired.

### **RESPONSE I-1-3**

The commenter opines that a moveable floor will add to the operating expenses of the Project. The commenter also notes that despite the proposed moveable floor, the overall depth of the indoor pool detracts from its use by individuals with varying physical abilities. As such, a possible solution would be to include a shallow area (4 to 7 ft) that would gradually feed into the deeper area of the pool to serve the needs of all individuals utilizing the pool. The commenter also notes that having a shallower area would allow for optimal use of the pool because often times, the shallow end of the old pool was more frequently utilized than the deeper end.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, April 27, 2016 11:59 AM  
**To:** Ashley Davis; Alyssa Helper  
**Subject:** FW: Belmont Pool EIR Endorsement

-----Original Message-----

From: law2mom [<mailto:bpato@gmail.com>]  
Sent: Tuesday, April 26, 2016 9:26 AM  
To: Craig Chalfant  
Subject: Belmont Pool EIR Endorsement

Dear Mr. Chalfant,

As a young child swimmer, I have fond memories swimming at the Belmont Pool. As a master swimmer, I hope one day to swim in the new Belmont pool proposed. | I-2-1

After reviewing the Belmont DEIR, I fully support the proposed Project. I expect the project will make Long Beach, and the greater Los Angeles Area very happy with this wonderful facility that meets your project goals for providing utility to all swimmers, divers and other pool users including the young residents in Long Beach who need to learn to swim. | I-2-2

All the best with the Belmont Pool Project!  
Brian Patno

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**BRIAN PATNO**  
**LETTER CODE: I-2**  
**DATE: April 26, 2016**

**RESPONSE I-2-1**

This commenter expresses fondness for the former Belmont Pool facility and looks forward to the development of the revitalized Belmont Pool.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. Therefore, no additional response is necessary.

**RESPONSE I-2-2**

This comment expresses support for the proposed Project and notes that the Project will serve all swimmers, divers, and recreational swimmers in the City of Long Beach, including young residents.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Tuesday, May 03, 2016 12:34 PM  
**To:** Ashley Davis; Alyssa Helper  
**Subject:** FW: New Belmont Pool

Include with DEIR comments. Thanks!

**From:** Jason Ziccardi [<mailto:jbziccardi@gmail.com>]  
**Sent:** Saturday, April 30, 2016 12:50 PM  
**To:** Craig Chalfant  
**Subject:** New Belmont Pool

Hi Craig,

[This article](#) said I could email you with comments about the new pool.

It might be a little late for this, but I was super disappointed to see that it looks like there's no plan to return lighted volleyball courts to this area. The lit volleyball courts that were behind the old pool were a vibrant area of community recreation pretty much every summer night. There were at least 30-50 people playing every evening, with different people showing up all the time.

It was a really big loss to recreation and the volleyball community in the city to have them removed with the demolition, but most people had hope that the new pool would include this design element. Really sad that it looks like it wont.

Jason Ziccardi

I-3-1

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**JASON ZICCARDI**  
**LETTER CODE: I-3**

**DATE: April 30, 2016**

**RESPONSE I-3-1**

This comment expresses disappointment that the proposed Project does not include lighted volleyball courts that were previously present on the Project site as part of the former Belmont Pool facility. The comment goes on to state that the loss of the lighted volleyball courts is a loss to the community, as these courts were a valuable recreational resource.

As described in Chapter 3.0, Project Description, of the Draft Environmental Impact Report (EIR), the Pacific Ocean, the beach, bicycle and pedestrian pathways, and volleyball courts are located south of the Project site. The Project site would not interfere with the existing volleyball courts directly south of the site. It should be noted that these courts are not supported by lighting at this time; however, there were lights mounted on the former Belmont Pool facility that were directed at the beach volleyball courts adjacent to the building. The volleyball courts currently present south of the site would remain in operation in the post-project condition. Therefore, no additional response is necessary.

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**Subject:** FW: New Pool Question

-----Original Message-----

From: Billy [<mailto:wrcovington@gmail.com>]

Sent: Tuesday, May 03, 2016 5:33 AM

To: Craig Chalfant

Subject: New Pool Question

Hi Craig,

Just a quick, practical question about the new pool design:

If the roof is going to be glass, how the heck are we going to be able to keep it clean and maintained?

I love the look of it on paper, but I can't tell if anyone has thought about the practicalities of bird droppings and dirt buildup. I-4-1

Just something to think about.

Thanks,

--Billy Covington

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**BILLY COVINGTON**

**LETTER CODE: I-4**

**DATE: May 3, 2016**

**RESPONSE I-4-1**

This commenter asks how the proposed Belmont Pool facility would be clean and maintained. The commenter makes specific reference to the potential for bird droppings and dirt buildup.

It is industry standard for annual inspections to be performed by experienced inspectors. The proposed Ethylene tetrafluoroethylene (ETFE) material is chemically related to “Teflon” and shares many of its properties, such as having a low coefficient of friction and a non-porous surface allowing the natural action of rain to clean its surface. Deposits of dirt, dust, and bird droppings remain unattached to the surface and are washed away by rain. The natural process of wind will remove dust and dirt. In climates where rain is too infrequent to be considered the main cleansing process, a simple cleaning regimen can be implemented that consists of low pressure running water. No use of chemicals or physical wiping of the surface would be required, as debris does not adhere to the surface and the material does not streak when drying. Fritting of the ETFE will help hide accumulated dirt or dust.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. Therefore, no additional response is necessary.

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1 MS. BODEK: I'm going to go off the top of my  
2 head. I believe the existing height limit is 36 feet,  
3 and this will be somewhere around 68 feet.

4 The existing -- I should not say the  
5 existing facility. The old Belmont Pool was 58 feet or  
6 so, so that already exceeded the height limits for the  
7 specific zoning area, and this will also exceed that.

8 So there is an expectation that this  
9 project would require a variance.

10 COMMISSIONER VAN HORIK: And again, repeat what's  
11 the height of the new?

12 MS. BODEK: I'm going to just clarify that and get  
13 back to you.

14 COMMISSIONER VAN HORIK: Okay. Thank you.

15 CHAIRMAN CHRISTOFFELS: Seeing no other  
16 commissioners requesting additional information, thank  
17 you, Mr. Modica.

18 And with that, we will open it to the  
19 public. If you are present tonight to speak on this  
20 matter, please come forward. Come to the podium. I  
21 need you to say your name and address for the record.  
22 You'll have three minutes to speak, and for your  
23 convenience, there will be a clock behind me.

24 MS. SILMER: Thank you. My name is Laura Silmer.  
25 My address is on file with the City.

↓ I-5-1

1 I did not come to speak about this project,  
2 but I'm fascinated. I think it's a beautiful, just a  
3 stunning building, as the Commissioner said over here.

↑  
I-5-1

4 My question is cleaning the building. Has  
5 the architect addressed how to keep those beautiful  
6 transparent windows transparent? Because we are located  
7 near a port, and I know that some of our solar panels  
8 were unworkable that the City owned because so much soot  
9 had collected on the horizontal structures. Plus the  
10 maintenance, you know, the extra cost of maintaining  
11 that style of design to keep it looking the way it's  
12 shown.

I-5-2

13 Thank you.

14 CHAIRMAN CHRISTOFFELS: You're welcome. Thank  
15 you.

16 MS. CHRISTENSEN: I'd like to ask a quick question  
17 before my time starts, and that is while I understand  
18 that oral comments tonight will not get a response, are  
19 they entered into the EIR record?

20 CHAIRMAN CHRISTOFFELS: Yes. So your comment will  
21 go on the record, but if you're looking for a formal  
22 response to that, you'll need to provide it --

23 MS. CHRISTENSEN: Thank you.

24 My name is Ann Christensen. I live at  
25 259 Termino, so I am local, very local resident. I am

**LAURA SILMER**  
**LETTER CODE: I-5**

**DATE: May 5, 2016**

**RESPONSE I-5-1**

This comment is introductory in nature and provides background information about the commenter.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-5-2**

This comment expresses concern with respect to the cleaning and maintenance of the Ethylene tetrafluoroethylene (ETFE) materials. The commenter goes on to note that solar panels are not feasible on many projects in the City of Long Beach because of maintenance costs, and as such, questions the maintenance costs associated with ETFE materials.

It is industry standard for annual inspections to be performed by experienced inspectors. The proposed Ethylene tetrafluoroethylene (ETFE) material is chemically related to “Teflon” and shares many of its properties, such as having a low coefficient of friction and a non-porous surface allowing the natural action of rain to clean its surface. Deposits of dirt, dust, and bird droppings remain unattached to the surface and are washed away by rain. The natural process of wind will remove dust and dirt. In climates where rain is too infrequent to be considered the main cleansing process, a simple cleaning regimen can be implemented that consist of low pressure running water. No use of chemicals or physical wiping of the surface would be required, as debris does not adhere to the surface and the foil does not streak when drying. Fritting of the ETFE will help hid accumulated dirt or dust.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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1 I did not come to speak about this project,  
2 but I'm fascinated. I think it's a beautiful, just a  
3 stunning building, as the Commissioner said over here.

4 My question is cleaning the building. Has  
5 the architect addressed how to keep those beautiful  
6 transparent windows transparent? Because we are located  
7 near a port, and I know that some of our solar panels  
8 were unworkable that the City owned because so much soot  
9 had collected on the horizontal structures. Plus the  
10 maintenance, you know, the extra cost of maintaining  
11 that style of design to keep it looking the way it's  
12 shown.

13 Thank you.

14 CHAIRMAN CHRISTOFFELS: You're welcome. Thank  
15 you.

16 MS. CHRISTENSEN: I'd like to ask a quick question  
17 before my time starts, and that is while I understand  
18 that oral comments tonight will not get a response, are  
19 they entered into the EIR record?

20 CHAIRMAN CHRISTOFFELS: Yes. So your comment will  
21 go on the record, but if you're looking for a formal  
22 response to that, you'll need to provide it --

23 MS. CHRISTENSEN: Thank you.

24 My name is Ann Christensen. I live at  
25 259 Termino, so I am local, very local resident. I am

↓ I-6-1

1 also a member loosely of the aquatics community.  
2 However -- I don't know if I can do this in three  
3 minutes, but I'll just state right off the bat that I  
4 don't think we need a double wide. This is double wide,  
5 like a double wide trailer.

I-6-1

6 I think the main reason right now, the  
7 reason I think has maybe the most hope of before a  
8 planning committee that already approved a giant glass  
9 building in our wetlands sanctuary and had to be stopped  
10 with a \$50,000 lawsuit from a nonprofit wetlands group a  
11 number of years ago, I don't think you will hesitate to  
12 follow the mitigation plan of avoiding impact from the  
13 bird -- shorebirds.

I-6-2

14 And these are not just any birds. These  
15 are protected wildlife shorebirds -- by the suggested  
16 mitigation chop down the trees they nest in. I mean,  
17 really? That's how you mitigate the fact that there are  
18 shorebirds? Insane.

19 So anyway, but what I'm concerned about as  
20 a member of the aquatics community is that kids in Long  
21 Beach learn how to swim. Now, there wasn't an Olympic  
22 pool when I was a kid. I had to wait 'til I was four  
23 feet high, which took a long time, and learn to swim at  
24 Wilson High School.

I-6-3

25 Now the Wilson High School pool apparently

1 isn't good enough for the Wilson High School water polo  
2 team, which has used this facility and now brings the  
3 band and plays water polo outside while the shorebirds  
4 are trying to nest.

I-6-3

5 So I don't know with this extended outdoor  
6 pool, it seems like it's just going to continue. But  
7 I'm really concerned -- and I hope this is heard -- when  
8 it talks about how all these other plans aren't  
9 workable. First of all, if the Harry Bridges Park is  
10 federally mandated to have outdoor recreation, then you  
11 can put an outdoor pool there, and then the inner city  
12 kids in the First District would have someplace to learn  
13 to swim.

I-6-4

14 Now, I understand, you know, 'cause I am  
15 very close with someone at Leeway Sailing -- which, by  
16 the way, needs a lot more promotion, could be run  
17 yearlong. It's an amazingly great program. And I know  
18 they have an arrangement. I'm not saying build no pool,  
19 but I'm saying can't we share the wealth? I know it may  
20 be Tideland's Oil money, but I'm sure there's other  
21 money, as well.

I-6-5

22 All I'm saying is that people in Long Beach  
23 are in the long run -- this is the Long Beach City  
24 project. This is going to be supported by the City  
25 Council, and while one district may say I'll stay out of

I-6-6

1 your backyard if you stay out of mine, we need to plan  
2 that our whole city, all the kids learn to swim, and  
3 it's crazy to put two gigantic pools right next to each  
4 other in the most affluent part of town. That just is  
5 not -- it's not -- it's not good. It's not smart.

I-6-6

6 CHAIRMAN CHRISTOFFELS: Thank you.

7 MS. CHRISTENSEN: And also, just one last thing.  
8 Don't we have eminent domain regarding these 30-year  
9 leases for the better public?

I-6-7

10 MS. JOHNSON: Good evening, Commissioners. My  
11 name is Lucy Johnson. I'm a resident of the Fifth  
12 District and a very passionate advocate for this new  
13 project. I first want to commend Mayor Garcia,  
14 Assistant City Manager Tom Modica, Director Amy Bodek,  
15 and all the staff, City staff, especially Councilmember  
16 Suzie Price and her staff for all their work in getting  
17 us this far in the process. I also want to commend the  
18 project and design teams for all their efforts. I think  
19 you've seen a very stunning presentation.

20 The Draft EIR is on the table now, and yes,  
21 there are opponents to the project; however, I sincerely  
22 hope that the Planning Commission accepts this draft as  
23 the final EIR without letting the naysayers control, or  
24 just as importantly, delay the process with specious  
25 arguments, while adding hundreds of thousands of dollars

**ANNA CHRISTENSEN**

**LETTER CODE: I-6**

**DATE: May 5, 2016**

**RESPONSE I-6-1**

This comment is introductory and expresses concern about the aesthetics of the proposed Project. The commenter expresses the opinion that the proposed Project would look like a double-wide trailer.

Section 4.1, Aesthetics, of the Draft Environmental Impact Report (EIR) includes an analysis of the design and visual character of the proposed Project with relation to public views and scenic vistas. As described throughout this section of the Draft EIR, implementation of the proposed Project would not result in significant impacts related to aesthetics. Furthermore, this comment is expressive of the opinion of the commenter and does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. Therefore, no additional response is necessary.

**RESPONSE I-6-2**

This comment references a different project that was presented before the Planning Commission and expresses concern relating to that project's impacts to shorebirds.

The comment mistakenly suggests that impacts to birds would be mitigated through the removal of trees. Impacts to shoreline birds in the Project area are discussed in Section 4.3, Biological Resources, of the Draft EIR. As described further in this section of the Draft EIR, the proposed Project would result in less than significant impacts to nesting birds in the Project area with adherence to Mitigation Measure 4.3.1. Mitigation Measure 4.3.1 requires that if construction is proposed during the active nesting season, a qualified biologist familiar with local avian species and the requirements of the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code shall conduct a preconstruction survey for nesting birds prior to construction and shall record the results of the survey in a memorandum to be submitted to the City of Long Beach (City) Parks, Recreation, and Marine Director. If the survey identifies nesting, the memorandum shall be submitted to the California Department of Fish and Wildlife (CDFW) to determine the appropriate action. If nesting birds are present, a qualified biologist shall also be retained to monitor the site during initial vegetation clearing and grading, as well as other activities that would have the potential to disrupt nesting behavior. With implementation of this measure, construction impacts (including construction noise impacts) to nesting birds were determined to be less than significant.

In addition to construction noise, it is important to note that operational activities associated with the proposed Project would be similar in scale and nature to those at the former Belmont Pool facility. As such, operational noise impacts to potential on-site nesting birds would be similar to those at the former facility. Furthermore, as described further on Page 4.3-18 of Section 4.3, Biological Resources, "the bird species present in the Project area are currently coexisting with

pool and park users and are accustomed to human intrusion and noise and are anticipated to be able to reestablish to the relocated trees and adapt to the additional trees installed as part of the proposed Project. Therefore, long-term operation of the proposed Project is anticipated to have less than significant impacts on nesting and/or roosting birds.”

### **RESPONSE I-6-3**

This comment provides background information about the commenter and expresses the importance of swimming in the community. The comment states that the pool at Wilson High School is no longer used by the school water polo team and suggests that the Wilson High School water polo team now uses the temporary Belmont Pool facility. As such, the commenter expresses concern related to noise from the band and water polo games and how this noise disrupts the shoreline birds while they are nesting near the Project site.

This comment is information in nature and does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. Therefore, no additional response is necessary.

### **RESPONSE I-6-4**

This comment expresses concern that the outdoor component of the proposed Project will continue to have similar issues related to disturbing shorebirds, as described in comment I-6-3. This comment also questions why other plans are not workable. The commenter makes reference to the Harry Bridges Park alternative site. The commenter further states that locating the proposed Project at Harry Bridges Park would be allowed and would provide access to children in the First District.

Please refer to Response I-6-3, above, for further discussion related to the Project’s impacts on nesting/roosting birds.

Chapter 5.0, Alternatives, in the Draft EIR considered and analyzed Harry Bridges Memorial Park as an alternative project location for the proposed Project. As stated in the Draft EIR, the Harry Bridges Memorial Park site was ultimately determined to be infeasible because this park was designated as part of the parkland mitigation for the development of the Aquarium of the Pacific and Rainbow Harbor to replace recreational open space in Shoreline Park funded under the Land and Water Conservation Fund (LWCF) Act. Under Section 6(f)(3) of the LWCF Act, the Harry Bridges Memorial Park may not be converted to uses other than a public outdoor recreation use. For this protection to include the proposed Project’s enclosed areas as an allowable use, a petition to the Secretary of the Interior would be required. The petition process with the Secretary of the Interior was considered prohibitive due to the extended time, cost, and uncertain outcome. There are additional constraints related to park size and available parking that eliminated the consideration of this alternative project location. For these reasons, the Harry Bridges Memorial Park is not considered a feasible alternative project site on which the proposed Project could be developed.

### **RESPONSE I-6-5**

This comment states that the commenter is not against implementation of the proposed Project, but would like to make the pool accessible to other areas/communities in the City. The commenter also references other funding mechanisms for the proposed Project.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

### **RESPONSE I-6-6**

This comment suggests that the pool should be developed in another location of the City rather than having two pools next to each other in an affluent part of the City. Chapter 5.0, Alternatives, in the Draft EIR considered and analyzed alternative project locations for the proposed Project. The analysis concluded that relocating the Project to an alternative location would not avoid or reduce any of the potentially significant impacts of the proposed Project. Furthermore, a large majority of the funding for the proposed Project would originate from Tidelands funds, which are legally mandated to fund development within the City's Tidelands area. Therefore, developing the proposed Project at an alternative location in the City outside of the Tidelands area with Tidelands funds would be expressly prohibited. Due to the cost of the Project, developing the Project outside of the Tidelands area without the Tidelands funds would also be infeasible due to a lack of funding sources. Furthermore, the primary objective of the Project is to replace the former facility in its original location. It should also be noted that the proposed Project was initiated prior to the demolition and removal of the old facility, as it has long been the City's intention to replace the old facility on the same site.

### **RESPONSE I-6-7**

This comment asks whether eminent domain can be used for 30-year leases if they are for public betterment. It is assumed that the 30-year lease referenced in this comment refers to the "Elephant Lot" at the Long Beach Convention Center (LBCC), which is a parking lot on the east side of LBCC that is leased to the Jehovah's Witness organization to accommodate parking demands during the annual convention at LBCC. The lease expires in 2030 and requires 3,000 parking spaces in two different lots, one of which is the Elephant Lot that provides 1,915 of these spaces.

While Eminent Domain could be exercised to obtain the use of this parking lot for the development of the proposed Project, the loss of the 1,915 parking spaces for the Jehovah's Witness Organization or LBCC would require additional mitigation. Additionally, special events, such as the annual Grand Prix of Long Beach, also use this parking lot for events and staging. For these reasons, the use of Eminent Domain for purposes of developing the Project on the Elephant Lot would not be considered reasonable because development of the Project on this alternative site would not be the highest and best land use for the area adjacent to LBCC.

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1 your backyard if you stay out of mine, we need to plan  
2 that our whole city, all the kids learn to swim, and  
3 it's crazy to put two gigantic pools right next to each  
4 other in the most affluent part of town. That just is  
5 not -- it's not -- it's not good. It's not smart.

6 CHAIRMAN CHRISTOFFELS: Thank you.

7 MS. CHRISTENSEN: And also, just one last thing.  
8 Don't we have eminent domain regarding these 30-year  
9 leases for the better public?

10 MS. JOHNSON: Good evening, Commissioners. My  
11 name is Lucy Johnson. I'm a resident of the Fifth  
12 District and a very passionate advocate for this new  
13 project. I first want to commend Mayor Garcia,  
14 Assistant City Manager Tom Modica, Director Amy Bodek,  
15 and all the staff, City staff, especially Councilmember  
16 Suzie Price and her staff for all their work in getting  
17 us this far in the process. I also want to commend the  
18 project and design teams for all their efforts. I think  
19 you've seen a very stunning presentation.

20 The Draft EIR is on the table now, and yes,  
21 there are opponents to the project; however, I sincerely  
22 hope that the Planning Commission accepts this draft as  
23 the final EIR without letting the naysayers control, or  
24 just as importantly, delay the process with specious  
25 arguments, while adding hundreds of thousands of dollars

I-7-1

I-7-2

1 to the eventual cost due to their delaying tactics.

2           While it is nice that there are people in  
3 the community who care passionately about birds and  
4 trees, this project will have a tremendously beneficial  
5 -- will be tremendously beneficial to the 460,000 plus  
6 citizens of Long Beach and many more in the surrounding  
7 region.

8           This project is not some new monstrosity  
9 being placed on our coastline for the benefit of a few  
10 private interests. Instead, it is a replacement for the  
11 now defunct world-renowned Belmont Plaza Olympic Pool.

12           Please signify that you all understand the  
13 project serves many needs for our community and, at the  
14 appropriate time, approve the project as presented.

15           I do want to comment a little bit on  
16 Commissioner Templin's question on the parking. The  
17 existing pool that was there starting with the Olympic  
18 Trials in 1968 has had two Olympic Trials, two NCAA  
19 men's championships, myriads of regional meets during  
20 the years, and there has never been that parking lot  
21 filled on the west side, east side of the building.

22           So I think there's a lot -- if you keep  
23 that in mind that we've had all these projects and  
24 special events in the past, and parking hasn't been that  
25 much of a problem. You've got a lot of other uses down



I-7-2

I-7-3

1 there with the dog beach and volleyball, but it's still  
2 -- Touch-A-Truck on Sunday. That parking lot, I've  
3 never seen it filled before Sunday. And there's parking  
4 on the other side of the structure, as well.

↑  
I-7-3

5 So I do hope you will keep those things in  
6 mind and keep in mind that this is replacing an existing  
7 facility that had all of those special events, as well  
8 as the fact that we only currently have three public  
9 pools in this entire city for over 460,000 people.

I-7-4

10 The high school pools that open in the  
11 summer are open for only two months in the summer, and  
12 we do need to get all the kids trained in learning how  
13 to swim. And adults, too.

14 So again, I hope you take all of this into  
15 account and approve the EIR as it comes forward to you.  
16 Thank you.

I-7-5

17 CHAIRMAN CHRISTOFFELS: Thank you for your  
18 comments.

19 Is there anybody else that would like to  
20 speak on this matter? Please come forward.

21 Seeing none, Mr. Modica, could you answer a  
22 few questions? One was I would be interested in  
23 knowing, as well, how do you keep that glass clean.

24 MR. MODICA: So I will start with my  
25 understanding, and then we have Duane Fisher here, one

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**LUCY JOHNSON**  
**LETTER CODE: I-7**

**DATE: May 5, 2016**

**RESPONSE I-7-1**

This comment is introductory in nature and expresses the commenter's appreciation for the City of Long Beach's (City) efforts on the proposed Project.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. Therefore, no additional response is necessary.

**RESPONSE I-7-2**

This comment expresses support for the Project and recommends that the Planning Commission approves the Draft EIR as the Final EIR. The commenter further notes the opinion that the proposed Project will be beneficial to the citizens of the City and the region.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

**RESPONSE I-7-3**

This comment discusses current and past parking conditions on the Project site. The commenter states that even during large aquatic events, there is sufficient parking available.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

**RESPONSE I-7-4**

This comment notes that the proposed Project is replacing an existing facility. In addition, the commenter further notes that only three public pools currently serves the City, and the pools at high schools are only open during the summer months.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

**RESPONSE I-7-5**

This comment expresses support for approval of the EIR and the proposed Project.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

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**Maryanne Cronin**

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**Subject:** FW: Comments on the Draft EIR for the proposed Belmont pool project  
**Attachments:** Draft EIR LJ comments 160603.docx

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**From:** Lucy Johnson [<mailto:lucyjohnson1@gmail.com>]  
**Sent:** Friday, June 03, 2016 12:37 PM  
**To:** Craig Chalfant  
**Cc:** Amy Bodek; Ashley Davis  
**Subject:** Comments on the Draft EIR for the proposed Belmont pool project

Craig,

I am a passionate advocate for the proposed Belmont pool project, with a strong desire to see Long Beach once again offering a world-class, state-of-the-art aquatics facility, even better than the original Belmont Plaza Olympic Pool was in its heyday.

My comments (see attached) are lengthy, because I went through the DEIR in some detail. My intent is to perhaps shed some perspective on what we once had here, and what I fervently wish Long Beach to have once again.

Some of the comments are housekeeping in nature, where I saw what might have been an error or two. Other comments are, I hope, intended to strengthen or bolster some of the points made in the document, particularly in discussing the alternatives (location and scope of the project). I hope no one reading them will take offense at any of my suggestions, as they are not intended to be criticisms of either the proposed project or the DEIR.

Overall, I am quite pleased with this DEIR, and truly admire the work and knowledge that has been put into the document by all parties involved in its creation.

Thanks to you all,

Lucy

P.S. I tried to keep the outlining format consistent, but ran into problems starting with Section 5. If it causes any issues, please feel free to call or email me with any questions.

--  
 Lucy Johnson  
 Vice President & Development Director  
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 562-431-0052  
[www.facebook.com/RebuildBelmontPlazaOlympicPool](http://www.facebook.com/RebuildBelmontPlazaOlympicPool)

Written Comments to Draft Environmental Impact Report (DEIR) for Belmont Pool Revitalization Project

June 3, 2016

From
Lucy Johnson
2402 Petaluma Avenue
Long Beach, CA 90815-2424
562-431-0052
lucyjohnson1@gmail.com

1. EXECUTIVE SUMMARY

No comments on this section.

2. INTRODUCTION

2.1. Purpose and Type of EIR/Intended Uses of the EIR

No comments on this section.

2.2. Public Review Process

2.2.1.No comments on this section

2.2.2.Areas of controversy (page 2-3, first paragraph)

Potential for increased traffic – This project replaces n aquatics facility that had been in the same location for over 46 years. In addition to the daily recreational uses of the original facility, it served as the site of numerous local, regional, national and international competitive aquatic events, some of which attracted more spectators than the replacement facility is designed to accommodate. Therefore, it is highly unlikely that there will be increased traffic to the location when compared to past events.

Potential for discovery of cultural resources – No comments for this Area.

Potential for air quality impacts - No comments for this Area.

Increase in wastewater discharges - No comments for this Area.

Potential for impacts to storm drain facilities - no comments for this Area.

Concerns of pool design and amenities meeting the overall desires of the swimming community – First (housekeeping), these concerns were not just from the swimming community, but also the water polo and diving communities.

Second, keep in mind that the original Belmont Plaza Olympic Pool was a world-class, state-of-the-art aquatic center at the time is was constructed in 1968, but with

I-8-2

I-8-3

I-8-4

I-8-5

I-8-6



subsequent rule changes by the various governing bodies for diving, swimming, synchronized swimming and water polo, plus many years of deferred maintenance, it became obsolete a number of years ago, no longer able to attract most major events.

↑  
I-8-6

*Third*, most of the concerns were resolved through the meetings with the stakeholder committee members. *However*, there remains a major concern with the number of permanent seats planned for the new indoor facility. A planned capacity of 1,250 *might* be barely adequate to once again attract NCAA championship events. (Compare that number to the 2,400 seats in the original facility.) A majority of the stakeholder committee recognized this deficiency, and fought, to no avail, to include a larger number of permanent seats. Following the closure of the original pool, the Mayor and Councilmembers had all agreed that the replacement facility should once again give the City of Long Beach a world-class, state-of-the-art aquatic facility. With just 1,250 permanent seats, the new complex is most likely to attract local, regional, and perhaps statewide events, but not the numerous national and occasional international events that the former facility once attracted. In my opinion, the lack of adequate permanent seating is the one single thing that will keep us all from reaching the goal of a world-class facility. Many others agree.

I-8-7

2.3. through 2.8 - No comments on these sections, as they refer to other sections that follow.

I-8-8

**3. PROJECT DESCRIPTION**

**3.1. PROJECT LOCATION AND SITE DESCRIPTION**

**3.1.1. Former Belmont Pool Characteristics**

(Page 3-1, 4<sup>th</sup> line) “...(2) the restaurant/banquet hall...”

Comment: On the ground level, that space at the west end of the building, was originally constructed and intended to be a snack bar for users of both the pool patrons and spectators, and beach users. The upper level was intended to be a community meeting space. However, the City later decided to lease the snack bar and community rooms to private, for-profit restaurant operators for dining and banquet/wedding receptions. The pool and beach patrons no longer had public access to a snack bar or community meeting rooms.

I-8-9

The new complex should include space that will honor the original purpose of a snack bar serving pool and beach patrons, and community meeting space, rather than offering a restaurant space to a for-profit operator.

3.1.2. **Temporary Pool** - No comments on this Section.

I-8-10

**3.1.3. Existing Access and Parking**

(Page 3-7) Existing access and parking are adequate for the new facilities. Per City staff, there are in excess of 1,000 parking spaces between the Beach Parking Lot on the east side of the project and the Pier Parking Lot on the west side. Past events held at the original

I-8-11  
↓

Belmont Plaza Olympic Pool have not filled the two lots. It is unlikely that both will be filled during future events at the new aquatic complex.

I-8-11

3.1.4. **Surrounding Land Uses** - No comments on this section.

I-8-12

**3.2. CITY OF LONG BEACH LAND USE AND ZONING DESIGNATIONS**

No comments on this section.

**3.3. PROJECT HISTORY AND BACKGROUND**

3.3.1. **Notable Aquatic Events** (page 3-8)  
(Housekeeping)

a) The last two (2) sentences of the last paragraph on page 3-13 of this section 3.3.1 works better if moved to follow the first (1<sup>st</sup>) sentence of the second paragraph on page 3-8.

I-8-13

b) Delete the entire third sentence (fourth sentence if the suggested change in a) above is made), and replace with the following, "The facility hosted both the 1968 Men's and the 1976 Men's and Women's U.S. Olympic swimming trials, as well as the 1974 and 1978 Men's National Collegiate Athletic Association (NCAA) swimming championships, and from 1969 through 1994, hosted 23 of the first 26 Men's NCAA water polo championships."

I-8-14

**3.3.2. Proposed Project Planning**

Based solely on budgetary concerns of City staff, the Stakeholder Committee agreed to a design that would include 1,250 permanent seats within the indoor component. However, many of the Stakeholder Committee members believe that number is inadequate, and would like to see it increased to at least 1,500. The cost estimate for 1,500 permanent seats that was provided to the Stakeholder Committee in August, 2014, was \$2,000,000 higher than the estimated cost for 1,250 seats. (See also my comments in Section 2.2.2, under Concerns of pool design and amenities meeting the overall desires of the swimming community.)

I-8-15

**3.3.3. Notable Aquatic Events**

(page 3-8) (Housekeeping)

a) The last two (2) sentences of the last paragraph on page 3-13 of this section 3.3.1 works better if moved to follow the first (1<sup>st</sup>) sentence of the second paragraph on page 3-8.

I-8-16

b) Delete the entire third sentence (fourth sentence if the suggested change in a) above is made), and replace with the following, "The facility hosted both the 1968 Men's and the 1976 Men's and Women's U.S. Olympic swimming trials, as well as the 1974 and 1978 Men's National Collegiate Athletic Association (NCAA) swimming championships, and from 1969 through 1994, hosted 23 of the first 26 Men's NCAA water polo championships."

I-8-17

**3.4. PROJECT CHARACTERISTICS**

|  |             |
|--|-------------|
| See comments for 2.2.2 and 3.3.2 regarding permanent seating.  | I-8-18      |
| 3.4.1. <b>Site Design/Layout</b> – No comments on this Section.  | I-8-19      |
| 3.4.2. <b>Structural Components</b> – No comments on this Section.   |             |
| <b>3.4.3. Indoor Aquatic Components</b>  |             |
| First bullet point, page 3-36 – Indoor 50-meter Competition Pool. Regarding the moveable floor. I am concerned about the ability to maintain this feature in a smoothly working condition over the long-term. Even without the moveable floor, the indoor pool will be used primarily for recreation, with lap swimmers, lessons, games, open recreation times, deep water aerobics, lessons and more regularly taking place. Almost all lap/recreational swimmers I have observed over many years do not feel a need to stand on the bottom of a pool during their recreational activity.   | I-8-20      |
| Second bullet point, page 3-36 – Indoor Teaching Pool. I offer two alternatives to the moveable floor for recreational users, the first of which I had proposed during the Stakeholder Committee meetings. <u>One</u> , expanding the Indoor Teaching Pool (as shown in figure 3.6a) from 820sqft. (roughly equivalent to 22.5 ft. wide x 36.5 ft. long.) to 1,350 sf. (22.5 ft.wide x 60 ft. long) will allow for three 7.5 ft. wide lanes of 20 yards each for those who want to lap swim while being able to stand up at any time. It would also offer a space for shallow water aerobics classes, lessons for beginners, and the warm water for aquatic therapy activities. This would negate the need for the moveable floor. The cost estimate for the moveable floor in August 2014 was \$1,900,000 (including a “maintenance fund budget” of \$500,000).The cost estimate at the same time indicated a cost of \$2,200,000 for a 900 sf. teaching pool.<br><u>Two</u> , in lieu of the moveable floor, the main 50-meter by 25-yard pool could have a small ledge indented into the walls of the pool at approximately a 5ft. depth all around for patrons to rest their feet between lengths of swimming. | I-8-21      |
| No additional comments on this Section.  |             |
| 3.4.4. <b>Outdoor Aquatic Components</b> - No comments on this Section.  | I-8-22      |
| 3.4.5. Did I miss seeing this Section? Page 3-39 seems to have finished 3.4.4, then jumped to 3.4.6.   | I-8-23      |
| <b>3.4.6. Operational Characteristics</b>  |             |
| The addition of a second 50-meter pool with this project enhances the ability of the City of Long Beach to offer expanded water activities. With just three public pools in a city with over 460,000 residents, the city has long suffered a shortage of pool time it can offer to the myriad of users and potential users. While the Long Beach Unified School District has several pools, the newest of which opened just over two years ago, but five of the six  | I-8-24<br>↓ |

(including Lakewood HS) were constructed around 1930, and are not in the best of condition. LBUSD does allow Parks Recreation & Marine to operate three of its pools, but for just two months each summer.

I-8-24

3.4.7. **Passive Park/Landscaping**

Regarding paragraph 2, some residents living near to the original facility have argued that the trees in the existing passive park area are “old growth trees.” A Google search for the term “old growth trees” results in the following: “Old-growth forests are natural forests that have developed over a long period of time, generally at least **120 years...**” Pictures of the Belmont Plaza Olympic Pool site from its earliest days confirm that the trees in the park now were planted at some date later than the opening of the pool, and therefore do not meet the definition of “old growth trees.”

I-8-25

3.4.8. **Proposed Pedestrian Access and Parking** – No comments on this Section.

3.4.9. **Signage** – No comments on this Section.

3.4.10. **Utilities and Public Services** – No comments on this Section.

3.4.11. **Conservation and Sustainability Features** – No comments on this Section.

3.5. **CONSTRUCTION ACTIVITIES** – No comments on this Section.

I-8-26

3.6. **PROJECT GOALS AND OBJECTIVES** - No comments on this Section.

3.7. **DISCRETIONARY PERMITS, APPROVALS, OR ACTIONS REQUIRED** - No comments on this Section.

4. **EXISTING ENVIRONMENTAL SETTING**

4.1. **AESTHETICS** - No comments on this preamble Section.

4.1.1 **Methodology** - No comments for this Section.

4.1.2 **Existing Environmental Setting**

(Housekeeping) In the last sentence of the first paragraph, where it reads, “...concrete wall lines the western side of Ocean Boulevard...” should say the “...south side of Ocean Boulevard...” because Ocean runs east and west.

I-8-27

In the second paragraph, please add the point that the Belmont Shore Condominiums were constructed approximately 20 years AFTER the original pool complex was built, meaning that those residents have never had a clear, straight-on view of the ocean from the lower floors of their units.

I-8-28

In the section titled, “Existing Visual Character of the Project Site” subtitled, “Pool Complex,” please remove the clause in the first paragraph that says, “La Palapa restaurant

I-8-29



located in the same building as the existing pool;” as the pool complex was not built the intent of that building being a part of a privately owned restaurant and event place. Instead, it was a part of the pool complex to serve as a snack bar for the pool and beach users, and as a community meeting space. (Section 4.10.2, second paragraph, third line also says “restaurant,” but should refer instead to the original intent of, and use as, a snack bar and community room.)

I-8-29

In the second paragraph of that same section, the third sentence refers to “a two-story community building that was rented for private events (such as weddings and conferences) on the west side.” Please refer to my comment directly above this one. Also, to my knowledge, the city does not have any other city-owned community rooms that are leased to private, for-profit entities which are allowed to rent out those community rooms, and keep the revenue from those rentals for their own accounts. To my knowledge, the libraries and senior centers with community rooms control the usage of those rooms, with any revenue going to the departments that oversee those facilities. Prior to the first Stakeholder Committee meeting, I had a telephone conversation with Chuck Posner, a staff member of the California Coastal Commission, who informed me that the owner of La Palapa had never received a CCC permit granting her the use of the second floor community room for private parties, wedding receptions, etc. He further indicated that the CCC would not have looked favorably on such a request.

I-8-30

No additional comments on this Section.

4.1.3 through 4.1.9 No comments on these Sections.

**4.2. AIR QUALITY** - No comments on this Section.

I-8-31

**4.3. BIOLOGICAL RESOURCES** - No comments on this Section.

**4.4. CULTURAL AND PALEONTOLOGICAL RESOURCES** - No comments on this Section.

**4.5. GEOLOGY** - No comments on this Section, with the exception of 4.5.5, *Project Impacts, response to Threshold 4.5.1: ii) on page 4.5-9.*

(Housekeeping) The second sentence states that the “site is located approximately 1.5 miles northeast of the Newport-Inglewood Structural Zone,” but the map in Figure 4.5.1 shows the site to be south of that fault, and the last sentence of section 4.5.2 *Existing Environmental Setting Regional Geology* on page 4.5-2, states “...active fault traces of the Newport-Inglewood Fault Zone 1.5 miles to the north...”

I-8-32

**4.6. GLOBAL CLIMATE CHANGE** - No comments on this Section, with the exception of 4.6.3, *Local Policies and Regulations, City of Long Beach Sustainable City Action Plan.*

(Housekeeping) The first sentence reads, “The City adopted the Long Beach Sustainable City Action Plan on February 2, 2019.” “Adopted” is past tense, while the date of “February 2, 2019” is in the future.

I-8-33

**4.7. HAZARDS AND HAZARDOUS MATERIALS** - No comments on this Section.

I-8-34

**4.8. HYDROLOGY AND WATER QUALITY** - - No comments on this Section.

**4.9. LAND USE** - No comments on this Section, with the exception of Tables 4.9.A and 4.9.B.

1) *Table 4.9.A: Consistency with California Coastal Act Policies, Page 4.9-2, California Coastal Act Policies, Section 301212.5.; Discussion/Analysis of the Proposed Project, Consistent*

Starting in line 8, and continuing through line 23, “As discussed in Section 4.13, (Housekeeping – the reference in the eighth line should be to 4.12, not 4.13.) Transportation and Traffic, of this Draft EIR, unless special events are held at both the indoor and outdoor pools simultaneously, the total number of spectators for the proposed Project is expected to be similar to the baseline conditions of the existing pool facility. Additionally, any event with more than 450 spectators would be considered a large special event that would require an Event Traffic Management Plan (Mitigation Measure 4.13.1).” (Housekeeping – reference should be to Mitigation Measure 4.12.1.)

I-8-35

The baseline conditions of the original facility routinely had events with more than 450 spectators (in a facility that had 2,400 seats), with no Event Traffic Management Plan required. The parking lots at each end of the project contain over 1,000 spaces for cars. The fact is that a good percentage of the cars parking for a large special event will contain more than one spectator; therefore, I suggest that the requirement for an Event Traffic Management Plan be applied only if the expectation for the number of spectators exceeds 1,250, which is the limit for spectators allowable due to the available number of permanent seats.

I-8-36

2) *Table 4.9.B: General Plan Land Use Policy Consistency Analysis, Page 4.9-23, Policies - Land Use, Consistency Analysis, Consistent*

The second paragraph in that Table again refers to requiring an “Event Traffic Management Plan, Mitigation Measure 4.12.1” for any event with more than 450 spectators. See my comments above for Table 4.9.A, Section 301212.5: and in my comments for Mitigation Measure 4.12.1.in Table 7.A, 4.12 Transportation and Traffic, on page 7-15.

**4.10.NOISE**

**4.10.1. Methodology** – No comments on this Section.

**4.10.2. Existing Environmental Setting** - No comments on this Section.

I-8-37

**4.10.3. Regulatory Setting** - No comments on this Section.

**4.10.4. Impact Significance Criteria** - No comments on this Section.

**4.10.5. Project Impacts, Long Term Operations, page 4.10-15**

I-8-38



Delete the words, "...daily events or..." from the sixth line of the first paragraph. There will not be a PA system in operation on a daily basis. Saying that noises from typical daily events would be similar to the noise generated by a PA system at a championship high school football game is not a correct analogy. Special events, yes. Daily events, no. The second paragraph in this subsection is correct.

I-8-38

**4.10.6. through 4.10.9** – No comments on these Sections.

#### **4.11. RECREATION**

I-8-39

**4.11.1. Methodology** – No comments on this Section.

**4.11.2. Existing Environmental Setting, Overview of Existing Recreational Environment**

The City's Parks, Recreation and Marine Department was not the owner of the pool named in the third bullet point. The Will J. Reid Scout Camp (within which the pool was located) was owned until 2013 by the Greater Long Beach Area Council of Boy Scouts prior to being sold to a private developer for a new housing project.

I-8-40

[http://www.gazettes.com/news/developer-ready-to-build-on-historic-will-j-reid-scout/article\\_cd96dde8-ff44-11e4-8c69-d7e4c0bf3ae5.html](http://www.gazettes.com/news/developer-ready-to-build-on-historic-will-j-reid-scout/article_cd96dde8-ff44-11e4-8c69-d7e4c0bf3ae5.html)

**4.11.3. Regulatory Setting** – No comments for this Section.

I-8-41

**4.11.4. Impact Significance Criteria** - No comments for this Section.

**4.11.5. Project Impacts, Threshold 4.11.2, Less than Significant Impact with Mitigation Incorporated.**

I-8-42

Regarding the eighth and ninth bullet points, please refer to my comments for 3.4.3 on page xxx of this document.

**4.11.6. through 4.11.9** – No comments on these Sections.

#### **4.12. TRANSPORTATION AND TRAFFIC**

**4.12.1. Methodology** - No comments for this Section.

I-8-43

**4.12.2. Existing Environmental Setting** - No comments for this Section.

**4.12.3. Regulatory Setting** - No comments for this Section.

**4.12.4. Impact Significance Criteria** - No comments for this Section.

**4.12.5. Project Impacts and Mitigation Measures, Threshold 4.12.1, Special Event Traffic,** second paragraph, page 4.12-12

I-8-44

See my comments for Section 4.9 regarding an Event Traffic Management Plan.

|  |        |
|--|--------|
| <b>4.12.6. Cumulative Impacts</b> – No comments for this Section.  | I-8-45 |
| <b>4.12.7. Level of Significance Prior to Mitigation</b>   | I-8-46 |
| Second paragraph, page 4.12-14 - See my comments for Section 4.9 regarding an Event Traffic Management Plan.   |        |
| <b>4.12.8. Mitigation Measures, Mitigation Measure 4.12.1</b>  | I-8-46 |
| See my comments for Section 4.9 regarding an Event Traffic Management Plan.  |        |
| <b>4.12.9. Level of Significance After Mitigation</b> – No comments on this Section.   | I-8-47 |
| <b>4.1. UTILITIES</b> – No comments on this Section.   |        |
| <b>5. ALTERNATIVES</b>   | I-8-47 |
| <b>5.1 INTRODUCTION</b> – No Comments on this Section.   |        |
| <b>5.1.1 Project Objectives</b>  | I-8-48 |
| Delete #2 in its entirety, and expand #1 to read as follows:<br>Redevelop the City-owned site of the former Belmont Pool with similar aquatic recreational purposes, consistent with the original ballot measure, while replacing the former Belmont Pool, a state-of-the-art, world-class facility when opened in 1968, with a more modern, state-of-the-art, world-class facility that better meets the needs of the today's local community, region and State's recreational and competitive swimmers, divers, aquatic sports participants, and additional pool users due to the tremendous demand for these services in the local community, region and State; |        |
| <b>5.1.2 Significant Unavoidable Impacts of the Proposed Project</b> - No comments on this Section.  | I-8-49 |
| <b>5.2 ALTERNATIVES INITIALLY CONSIDERED BUT REJECTED FROM FURTHER CONSIDERATION</b>   |        |
| <b>5.2.1 Fully Enclosed Pools Alternative</b>  | I-8-50 |
| I am not aware that this alternative was ever requested or discussed by members of the Stakeholders Committee. Is it necessary to include it in this Draft EIR?  |        |
| <b>5.2.2 Alternative Project Locations</b>   | I-8-51 |
| I completely agree with the Conclusion in this Section. Additionally, the three alternative sites are located primarily in commercial areas, well away from residential locations, and therefore are not easily accessible for as many residents and facility users, whether on foot, on a bicycle or in a car.  |        |

**5.3 ALTERNATIVES UNDER CONSIDERATION** - Comments pertain to the alternatives shown in Table 5.A.

**Table 5.A: Summary of Development Alternatives** – I would like to see the Analysis comments made a little stronger for some of the Alternatives.

**Alternative 1.** Make stronger by changing the second bullet point in the Basis for Selection and Summary Analysis from “Inconsistent with the majority of Project objectives.” to “Inconsistent with 13 of the 15 Project Objectives.” Also, add a third bullet point that would say, “Will reduce available aquatic recreational and training opportunities to a level below what was available with the former Belmont pool.”

**Alternative 2.** Make stronger by moving the seventh bullet point in the Basis for Selection and Summary Analysis upward to become the first bullet point.

**Alternative 3.** Make stronger by adding a fifth bullet point in the Basis for Selection and Summary Analysis along the lines of, “The prevailing afternoon winds in Long Beach raise a safety issue for divers training on the 5- and 10-meter towers.” Also, add a sixth bullet point that local divers training and competing on the tower apparatus now have to travel to Federal Way, WA or Colorado Springs, CO to find an indoor diving facility that offers tower diving. In addition, add a seventh bullet point stating that an indoor diving facility with tower diving will replace what was on the site previously within the former Belmont pool.

**Alternative 4.** Make stronger by adding a sixth bullet point in the Basis for Selection and Summary Analysis saying, “Unable to provide adequate programmable space.” (Same statement as made in the current seventh bullet point for Alternative 2.)

**Alternative 5.** Make stronger by inserting the word, “much” in front of “lesser degree” in the sixth bullet point in the Basis for Selection and Summary Analysis. Again, the objective here is to emphasize that this Alternative is not viable.

#### **5.4 ALTERNATIVE 1: NO PROJECT/NO NEW DEVELOPMENT**

**5.4.1 and 5.4.2** – No comments for these Sections.

##### **5.4.3 Attainment of Project Objectives**

Make stronger by adding the word, “fifteen” in front of the word, “...Project” in the first line of the first paragraph, to read, “...achieve two of the fifteen Project...”

##### **5.4.4 Conclusion**

Make stronger in the fourth line by adding the word, “vast” in front of the word, “majority.”

#### **5.5 ALTERNATIVE 2: MAINTAIN TEMPORARY POOL WITH ANCILLARY USES**

**5.5.1 and 5.5.2** – No comments for these Sections.

### 5.5.3 Attainment of Project Objectives

For the fifth and sixth lines of the second paragraph on page 5-17 that now reads, "...Alternative 2 would maintain the pool facility in a location that would serve the existing users, although not to the same extent as the proposed Project,..." I suggest inserting the words, "as no additional space for increased growth of aquatic activities would be gained (Objective xx)" after the comma following the word "Project" but before the words, "...and would provide a passive..."

I-8-62

Thus the entire phrase reads, "...Alternative 2 would maintain the pool facility in a location that would serve the existing users, although not to the same extent as the proposed Project as no additional space for increased growth of aquatic activities would be gained (Objectives 4, 5, and 8), and would provide a passive..." (The inserted language is underlined here for visibility.)

### 5.5.4 Conclusion

Referring to the use of the word, "incrementally" in the third line of the last paragraph, the definition of that word implies small. I do not agree that the elimination of the indoor component of the proposed project would be small. In fact, it would have a huge impact, as even with the temporary pool, there is a dearth of aquatic recreational and training opportunities in Long Beach. Perhaps there is a better word than incrementally that could be used?

I-8-63

## 5.6 ALTERNATIVE 3: OUTDOOR DIVING WELL/REVISED SITE PLAN

5.6.1 and 5.6.2 – No comments for these Sections.

I-8-64

### 5.5.3 Attainment of Project Objectives

- 1) This section as written is problematic in several respects.

The first paragraph on page 5-23 includes, "... the site plan under Alternative 3 would be revised to locate the diving well component outside in order to reduce the height of the Bubble structure." The third paragraph includes, "...space constraints would require the consolidation of pools. Which is it? A relocation of the diving well, or a consolidation of pools? This language is unclear as to what is meant by the word "consolidation." Does that mean a diving area would be included as a part of the outdoor pool (as implied by the word "consolidation), or does it mean that there would be a stand-alone diving well? The latter is much preferred, due to the temperature variations needed for divers versus swimmers. Please clarify.

I-8-65

- 2) Also in the third paragraph is this sentence, starting in the sixth line: "Competitive divers and certain competitive events prefer indoor competitive facilities over outdoor facilities." Strike the first word of that sentence, and add a clause after "outdoor facilities" to the effect that the reason divers and competitive diving events prefer an indoor facility is due to the vagaries of weather, a consistent air temperature is ideal.

I-8-66

- 3) It should also be pointed out here that the former Belmont pool offered one of just three indoor diving areas with tower diving equipment in the western United States, the others being in Federal Way, WA and Colorado Springs, CO. | I-8-67
- 4) Would a height variance be needed for an outdoor 10-meter diving tower, as that exceeds the 30' limit? | I-8-68
- 5) An outdoor diving facility with a 10-meter tower will require another structure (the tower equipment and associated stairs), which may have a negative impact on the views. | I-8-69

**5.6.4 Conclusion**

This Alternative does not demonstrate any appreciable differences for the overall project, except a) noise levels will be increased, and b) to make it less comfortable for the users. | I-8-70

**5.7 ALTERNATIVE 4: REDUCED PROJECT - NO OUTDOOR COMPONENTS**

**5.7.1 Description.**

Last sentence, page 5-25: "A height variance would still be required under this alternative ~~due to indoor diving well.~~" Delete all after the word alternative. | I-8-71

**5.7.2 Environmental Analysis** – No comments for this Section. | I-8-72

**5.7.3. Attainment of Project Objectives**

In the fifth and sixth lines of the first full paragraph on page 5-29, "...pool complex would not be able to hold as many special events and public aquatic opportunities" change to: "offer as many public aquatic opportunities or hold as many special events..." (Same comment for the third paragraph in 5.8.3.) | I-8-73

**5.7.4 Conclusion** – No comments for this Section.

**5.8 ALTERNATIVE 5: REDUCED PROJECT - NO DIVING WELL AND NO OUTDOOR COMPONENTS** | I-8-74

**5.8.1 and 5.8.2** – No comments for these Sections.

**5.8.3 Attainment of Project Objectives**

The fourth paragraph , in the first line on page 5-35 include the statement of, "...and **increases** programmable water space to minimize scheduling conflicts..." (emphasis is mine). How is this possible? Under this alternative, there would just the one 50-meter pool inside, without the water from the former T-shaped design, and the small therapy/teaching pool. This Alternative does not indicate that the two small outdoor pools (which have more water surface than the therapy/teaching pool) would be | I-8-75

retained. Overall this alternative would result in a decrease of water surface area than was in the former Belmont pool.

↑  
I-8-75

**5.8.4 Conclusion** - No comments for this Section.

6. **LONG-TERM IMPLICATIONS** – No comments for this Section.

I-8-76

**7. MITIGATION, MONITORING, AND REPORTING PROGRAM**

7.1. **MITIGATION MONITORING REQUIREMENTS** – No comments for this Section.

7.2. **MITIGATION MONITORING PROCEDURES** – No comments, with the exception of Table 7.A: Mitigation and Monitoring Reporting Program, Mitigation Measure 4.12.1:

Again, the definition of a “large special event” is ridiculously low. No such plan was ever required during the life of the former Belmont Pool, which routinely had events with more than 450 spectators, and often in excess of 1,000. If this mitigation measure is truly required, then the definition should show an increase to as a minimum the number of permanent seats (1,250). As stated earlier in this DEIR, there are in excess of 1,000 parking spaces in the two city-owned parking lots flanking the Proposed Project.

I-8-77

8. **LIST OF PREPARERS** – No comments on this Section.

I-8-78

9. **REFERENCES** - No comments on this Section.

~~~~~  
For either a cover letter, or the text in the sending email to which these comments will be attached.

As some of you reading these comments know, I am a passionate advocate for the proposed project, with a strong desire to see Long Beach offering a world-class, state-of-the-art aquatics facility, even better than the original Belmont Plaza Olympic Pool was in its heyday.

My comments {enclosed, or attached} are lengthy, because I went through the DEIR in detail. My intent is to perhaps shed some perspective on what we once had here, and what I fervently wish Long Beach to have once again.

I-8-79

Some of the comments are housekeeping in nature, where I saw what might have been an error or two. Other comments are, I hope, intended to strengthen or bolster some of the points made in the document, particularly in discussing the alternatives (location and scope of the project). I hope no one reading them will take offense at any of my suggestions, as they are not intended to be criticisms of either the proposed project or the DEIR.

Overall, I am quite pleased with this DEIR, and truly admire the work and knowledge that has been put into the document by all parties involved in its creation.

**LUCY JOHNSON**

**LETTER CODE: I-8**

**DATE: June 3, 2016**

**RESPONSE I-8-1**

This comment is introductory in nature and expresses the commenter's appreciation and support for the proposed Project. This comment also expresses admiration for the Draft Environmental Impact Report (EIR).

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

**RESPONSE I-8-2**

This comment indicates that the commenter does not have any comments on the Executive Summary chapter or the Purpose and Type of EIR/Intended Uses of the Draft EIR and Public Review Process subsections of the Introduction chapter of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

**RESPONSE I-8-3**

This comment describes the history of the site's use as the Belmont Pool Facility for the past 46 years. The commenter describes the daily recreational uses and complete events that occurred at the site and argues that because the proposed Project would replace the former facility with a similar facility, the new facility would not generate an increase in traffic compared to the former facility.

Section 4.12, Transportation and Traffic, of the Draft EIR addresses traffic impacts resulting from the proposed Project. The proposed Project could serve twice as many users compared to the former Belmont Pool facility. Consequently, operational traffic was doubled in order to analyze traffic impacts resulting from Project implementation. The results of this analysis indicated that all study area intersections would operate at Level-of-Service (LOS) C or better in the future with Project implementation. Therefore, the commenter is correct to state that the project-related increase in traffic would be less than significant with mitigation incorporated.

**RESPONSE I-8-4**

This comment notes that the commenter does not have any comments in relation to the "Potential for Discovery of Cultural Resources," "Potential for Air Quality Impacts," "Increase in Wastewater Discharges," and the "Potential for Impacts to Storm Drain Facilities" subsections of the Introduction of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-5**

This comment notes that while the Draft EIR is correct in describing the community's concern that the pool's design and amenities meet the overall desires of the swimming community, the Draft EIR should also note that these concerns were not just from the swimming community, but also the water polo and diving communities.

Although this suggested edit would improve the readability of this portion of the Draft EIR and clarify the interest groups, this comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-6**

This comment notes that while the former pool facility was a world-class, state-of-the-art center at the time it was constructed in 1968, subsequent rule changes by various governing bodies for swimming, synchronized swimming, and water polo (in addition to years of deferred maintenance) caused the facility to become obsolete and no longer able to attract most major events.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-7**

This comment notes that while most of the community's concerns were resolved through stakeholder meetings, a major concern related to the number of permanent seats planned for the indoor facility remains. The commenter notes that a planned capacity of 1,250 seats may be insufficient for attracting National Collegiate Athletic Association (NCAA) championship events, particularly because the former facility had a total of 2,400 seats. The commenter notes that this reduction in permanent seating would be the primary project component that would keep the Project from being characterized as a world-class facility.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

#### **RESPONSE I-8-8**

This comment indicates that the commenter does not have any comments on the remaining subsections of the Introduction chapter of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-9**

This comment notes that the former snack bar on the Project site included a snack bar on the first floor to serve pool patrons and beach users and a meeting space on the upper level. The commenter notes that the meeting space was originally intended to be available for use by the public, but both the snack bar and meeting spaces were later leased for dining and banquet/wedding receptions. As a result, the commenter notes that the pool and beach patrons no longer had public access to this facility. The commenter opines that the proposed Project should include a space that would serve the original purpose of the snack bar rather than offering a restaurant space to a for-profit operator.

This comment is an opinion regarding the design and use of the proposed Project but does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the City of Long Beach (City) decision-makers for their consideration. Therefore, no additional response is necessary.

#### **RESPONSE I-8-10**

This comment indicates that the commenter does not have any comments on the “Temporary Pool” subsection of Chapter 3.0, Project Description.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-11**

This comment indicates that the existing access and parking are adequate to serve the proposed Project. The commenter notes that per City staff, there is an excess of 1,000 parking spaces between the Beach Parking Lot on the east side of the site and the Pier Parking Lot west of the site. The commenter speaks from personal experience when noting that past events held at the former facility have not filled these parking lots, and, therefore, are not likely to fill these lots following Project implementation.

The commenter is correct in stating that past events held at the former facility have not filled existing parking lots serving the Belmont Pool and are not likely to be filled beyond their capacity following Project implementation. Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

### **RESPONSE I-8-12**

This comment indicates that the commenter has no comments on the “Surrounding Land Uses” and “City of Long Beach Land Use and Zoning Designations” subsections of Chapter 3.0, Project Description, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

### **RESPONSE I-8-13**

This comment suggests moving the last two sentences of the last paragraph on Page 3-13 of Section 3.3.1 of Chapter 3.0, Project Description, of the Draft EIR to follow the first sentence of the second paragraph on Page 3-8.

Although this suggested edit improves the readability of this portion of the Draft EIR, this comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

### **RESPONSE I-8-14**

This comment suggests replacing the third sentence from Subsection 3.3.1 of Chapter 3.0, Project Description, (or the fourth sentence if the suggested change in Comment I-8-3 is incorporated) with the following sentence:

“The facility hosted both the 1968 Men’s and the 1976 Men’s and Women’s U.S. Olympic swimming trials, as well as the 1974 and 1978 Men’s National Collegiate Athletic Association (NCAA) swimming championships, and from 1969 through 1994, hosted 23 of the first 26 Men’s NCAA water polo championships.”

While the editorial suggestion may help clarify the history of the facility, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

### **RESPONSE I-8-15**

This comment echoes the concerns addressed in Response I-8-7 related to the Project’s decrease in permanent seating as compared to the previous Belmont Pool facility. The commenter also notes that the cost estimate to provide an additional 250 permanent seats, which was echoed at the Stakeholder Committee in August, was estimated to be \$2,000,000 higher than the cost for 1,250 seats.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR, for further discussion related to the permanent seating capacity provided by the

proposed Project. This comment will be forwarded to the decision-makers for their review and consideration. Therefore, no additional response is necessary.

#### **RESPONSE I-8-16**

This comment reiterates the suggestions in Comment I-8-13 and suggests moving the last two sentences of the last paragraph on Page 3-13 of Subsection 3.3.1 (Chapter 3.0, Project Description) to follow the first sentence of the second paragraph on Page 3-8.

While the editorial suggestion may help clarify the discussion or text, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

#### **RESPONSE I-8-17**

This comment reiterates the suggestions in Comment I-8-14 and suggests deleting the third sentence (or the fourth sentence if the suggested change in Comment I-8-3 is incorporated) and replace with the following sentence:

“The facility hosted both the 1968 Men’s and the 1976 Men’s and Women’s U.S. Olympic swimming trials, as well as the 1974 and 1978 Men’s National Collegiate Athletic Association (NCAA) swimming championships, and from 1969 through 1994, hosted 23 of the first 26 Men’s NCAA water polo championships.”

While the editorial suggestion may help clarify the discussion or text, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

#### **RESPONSE I-8-18**

This comment reiterates the comments addressed in Comments I-8-7 and I-8-15 regarding the reduction in permanent seating associated with the proposed Project as compared to the former Belmont Pool facility.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR, for further discussion related to the permanent seating capacity provided by the proposed Project.

#### **RESPONSE I-8-19**

This comment indicates that the commenter does not have any comments on the “Site Design/Layout” and “Structural Components” subsections of Chapter 3.0, Project Description, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-20**

This comment expresses concern regarding the moveable floor because of the maintenance required to keep this component working properly on a long-term basis. The commenter goes on to note that the moveable floor is not required for the indoor pool because the pool will be primarily used for recreational activities, which do not require recreational users to stand on the pool bottom during such activities.

This comment is related to the pool mechanics and does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. Therefore, no additional response is necessary.

#### **RESPONSE I-8-21**

This comment outlines two alternatives to the movable floor. First, the commenter suggests expanding the Indoor Teaching Pool from 820 square feet (sf) (22.5 [ft] wide by 36.5 ft long) to 1,350 sf (22.5 ft wide by 60 ft long) to allow for three 7.5 ft wide lanes of 20 yards to provide additional space for users to swim laps while also being able to stand up at any time. The commenter also notes that this expanded area would also allow for additional space for shallow water aerobics classes, beginners swimming lessons, and warm water aquatic activities. For these reasons, the commenter notes that the suggested changes to the Indoor Pool would negate the need for a moveable floor, which would ultimately reduce costs associated with constructing and maintaining the moveable floor.

The second alternative suggested by the commenter is to provide a small ledge at the edge of the main 50-meter by 25-yard pool in lieu of the movable floor. This ledge would be indented to the walls at approximately 5 ft to allow for patrons to rest their feet between lengths of swimming.

This comment is related to the physical design of the pools and does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. Therefore, no additional response is necessary.

#### **RESPONSE I-8-22**

This comment indicates that the commenter does not have any comments on subsection “Outdoor Aquatic Components” of Chapter 3.0, Project Description, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

### **RESPONSE I-8-23**

This comment indicates that the numbering of the pagination is off as the subsections skip “3.4.5” and move directly from “3.4.3” to “3.4.6.”

This revision will be incorporated in the Errata to the Final EIR and does not change the analysis or conclusions contained in the Draft EIR. Therefore, no further response is necessary.

### **RESPONSE I-8-24**

This comment expresses support for the proposed Project and notes that the addition of the second 50-meter pool included as part of the Project would enhance the ability of the City to offer expanded water activities and would serve to complement existing pool facilities.

This comment is related to the physical design of the pools and does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. Therefore, no additional response is necessary.

### **RESPONSE I-8-25**

This comment describes complaints from some residents living near the Project site surrounding the removal of existing “old growth trees” on the site. The commenter describes research indicating that old growth trees are trees that are at least 120 years in age. As such, the commenter indicates that based on aerial imagery of the site from the site’s earliest operation, these trees were planted after the construction of the former pool facility and, therefore, should not be described as old growth.

This comment addresses other opinions, not a statement in the Draft EIR. However, the removal of on-site trees in order to facilitate Project implementation is addressed in Section 4.3, Biological Resources, of the Draft EIR. As described in this section of the Draft EIR, a tree removal permit would be obtained prior to any grading or construction activities and trees would be replaced at a 1:1 replacement ratio and a payment of a fee equivalent cost of a City-approved 15-gallon tree would be required (Mitigation Measure 4.3.2). Furthermore, these trees were determined to be ornamental and nonnative to the site. Therefore, impacts related to the removal of on-site trees were determined to be less than significant with mitigation incorporated.

### **RESPONSE I-8-26**

This comment indicates that the commenter does not have any comments on Subsections 3.4.8 through 3.4.11 of Chapter 3.0, Project Description, or on Subsection 4.1.1 of Section 4.1, Aesthetics, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

### **RESPONSE I-8-27**

This comment suggests that the last sentence of the first paragraph in Subsection 4.1.2 of Section 4.1, Aesthetics, of the Draft EIR should be revised to read "...south side of Ocean Boulevard..." rather than "...concrete wall lines the western side of Ocean Boulevard..." because Ocean Boulevard runs east and west.

This commenter is correct and the text will be revised to read: "An approximately six ft concrete wall lines on the southern side ~~the western side~~ of Ocean Boulevard, impairing much of the public view of the Pacific Ocean from this area." This revision and will be incorporated in the Errata to the Final EIR and does not change the analysis or conclusions contained in the Draft EIR. Therefore, no further response is necessary.

### **RESPONSE I-8-28**

This comment suggests adding language to the second paragraph under Subsection 4.1.2, Existing Environmental Setting, describing the fact that the Belmont Shore Condominiums were constructed approximately 20 years after the original pool complex was built, meaning that the residents of the Belmont Shore Condominiums never had a clear and direct view of the ocean.

The commenter is correct; however, while the editorial suggestion may help clarify the discussion or text, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

### **RESPONSE I-8-29**

This comment suggests removing the following clause in the first paragraph in Subsection 4.1.2: "La Palapa restaurant located in the same building as the existing pool" because the pool complex was not built with the intent of the restaurant facility being privately owned and operated. Rather, the commenter opines that this facility was intended for use as a snack bar open to pool and beach users, and as a community space. The commenter suggests removing a similar clause in Subsection 4.10.2.

Although the commenter is correct and the editorial suggestion may help clarify the discussion or text, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

### **RESPONSE I-8-30**

This comment states that the second paragraph of the "Existing Visual Character of the Project Site" subsection refers to a two-story community building that was rented for private events. The commenter goes on to state that the City does not have any other City-owned community rooms that are leased to private entities and states that similar facilities at libraries and senior centers lease these entities out with revenue going to the departments that oversee these

facilities. The comment concludes by stating that the commenter has no additional comments on the Aesthetics section of the Draft EIR.

This comment provides historic context, but does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. Therefore, no additional response is necessary.

### **RESPONSE I-8-31**

This comment indicates that the commenter has no comments on Section 4.2, Air Quality; Section 4.3, Biological Resources; and Section 4.4, Cultural Resources of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

### **RESPONSE I-8-32**

This comment notes that Section 4.5, Geology and Soils, describes the Project site as being located approximately 1.5 miles northeast of the Newport-Inglewood Structural Zone, but Figure 4.5.1 shows the site being located south of this fault zone. Further, the commenter notes that the last section of Subsection 4.5.1 describes active fault traces of the Newport-Inglewood Fault Zone 1.5 miles north of the site.

The commenter is correct in asserting that the site is incorrectly described as being located 1.5 miles northeast of the Newport-Inglewood Fault Zone on Page 4.5-5 of Section 4.5, Geology and Soils, of the Draft EIR. This change is illustrated below.

“Since the site is located approximately 1.5 miles ~~southwest northeast~~ of the Newport-Inglewood Structural Zone, significant ground shaking or secondary seismic ground deformation effects could occur at the site should a major seismic event occur along the Newport-Inglewood Structural Zone.”  
(Page 4.5-9)

This revision is an editorial suggestion that is intended to help clarify the discussion or text.

This comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. This revision will be incorporated in the Errata to the Final EIR and does not change the analysis or conclusions contained in the Draft EIR. Therefore, no further response is necessary.

### **RESPONSE I-8-33**

This comment notes an error in Section 4.6, Global Climate Change, of the Draft EIR, where the section describes the Long Beach Sustainable City Action Plan as being adopted on February 2, 2019.

The commenter is correct in asserting that this is the incorrect date of adoption for the City's Sustainable City Action Plan. The following change reflects the corrected date of adoption:

“The City adopted the Long Beach Sustainable City Action Plan on February 2, 2010 ~~2019~~.”  
(Page 4.6-19).

This revision is an editorial suggestion that is intended to help clarify the discussion or text.

This comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. This revision will be incorporated in the Errata to the Final EIR and does not change the analysis or conclusions contained in the Draft EIR. Therefore, no further response is necessary.

#### **RESPONSE I-8-34**

This comment indicates that the commenter does not have any comments on Sections 4.7, Hazards and Hazardous Materials, and Section 4.8, Hydrology and Water Quality, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-35**

This comment notes that the reference to Section 4.13, Transportation in Traffic (Table 4.9.A, Page 4.9-2) in Section 4.9, Land Use and Planning, is incorrect. The commenter notes that this reference, as well as the reference to Mitigation Measure 4.13.1 should be revised as follows:

As discussed in Section 4.12~~3~~, Transportation and Traffic, of the Draft EIR, unless special events are held at both the indoor and outdoor pools simultaneously, the total number of spectators for the proposed Project is expected to be similar to the baseline conditions of the existing pool facility. Additionally, any event with more than 450 spectators would be considered a large special event that would require an Event Traffic Management Plan (Mitigation Measure 4.12~~3~~.1).

This editorial revision will be incorporated in the Errata to the Final EIR and does not change the analysis or conclusions contained in the Draft EIR. Therefore, no further response is necessary.

#### **RESPONSE I-8-36**

This comment speaks from personal familiarity with the former Belmont Pool facility when stating that the former facility had events with more than 450 spectators with no requirement for an Event Traffic Management Plan, as required in Section 4.12, Transportation and Traffic, of the Draft EIR. The commenter goes on to state that the surface parking lots at each end of the

site contain over 1,000 spaces and have provided ample parking for spectators visiting the site. As such, the commenter suggests that the requirement for an Event Traffic Management Plan only be required if the number of spectators exceeds 1,250, which is equivalent to the number of permanent seats provided by the proposed Project.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

### **RESPONSE I-8-37**

This comment indicates that the commenter does not have any comments on Subsections 4.10.1 through 4.10.4 of Section 4.10, Noise, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

### **RESPONSE I-8-38**

This comment suggests deleting the words "...daily events or..." from the sixth line of the first paragraph in Subsection 4.10.5 of Section 4.1.0, Noise, because there will not be a Programmatic Agreement (PA) system in operation on a daily basis. The commenter also disagrees with the statement in the Noise section stating that noise associated with typical daily events would be similar to noise generated by a PA system at a championship high school football game is incorrect, as typical daily noise associated with the proposed Project would be significantly less than a championship football game. The comment concludes by stating that the second paragraph in this subsection is correct.

The commenter is correct in noting that the PA system would not be in use during typical daily operations. The sentence on Page 4.10-16 of Section 4.10, Noise, of the Draft EIR has been revised as follows:

Crowd noise was measured to be 65 A-weighted decibels (dBA) equivalent continuous sound level ( $L_{eq}$ ) at 75 ft. It is anticipated that reference noise level measurements obtained from RECON at the high school championship football game would be similar to ~~typical daily events~~ ~~or special events~~ using the PA system at the proposed Project.

This editorial revision will be incorporated in the Errata to the Final EIR and does not change the analysis or conclusions contained in the Draft EIR. Therefore, no further response is necessary.

### **RESPONSE I-8-39**

This comment indicates that the commenter does not have any comments on Subsections 4.10.6 through 4.10.9 of Section 4.10, Noise, or on Subsection 4.11.1, of Section, 4.11, Recreation, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-40**

This comment asserts that the City's Parks, Recreation, and Marine Department is not the owner of the Will Reid Scout Pool, but rather the pool was owned by the Greater Long Beach Area Council of Boy Scouts prior to being sold to a private developer for a new housing project in 2013.

The commenter is correct and the text on Page 4.11-2 of Section 4.11, Recreation, of the Draft EIR will be revised as follows:

In addition to the aquatic operations at the Project, the City's Department of Parks, Recreation, and Marine own and operate three additional Public Pool facilities (with the exception of the pool formerly known as the Will Reid Scout Pool, which is owned by Integral Communities).

This editorial revision will be incorporated in the Errata to the Final EIR and does not change the analysis or conclusions contained in the Draft EIR. Therefore, no further response is necessary.

#### **RESPONSE I-8-41**

This comment indicates that the commenter does not have any comments on Subsections 4.11.3 and 4.11.4 of Section 4.11, Recreation, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-42**

This comment reiterates the comments related to the proposed moveable floor. Please refer to Response I-8-21 for further discussion related to this commenter's suggestions regarding the moveable floor.

#### **RESPONSE I-8-43**

This comment indicates that the commenter does not have any comments on Subsections 4.12.1 through 4.12.4 of Section 4.12, Transportation and Traffic, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-44**

This comment expresses concern regarding the requirements of 450 spectators as the baseline for requiring an Event Traffic Management Plan, as required by Mitigation Measure 4.12.1.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

#### **RESPONSE I-8-45**

This comment indicates that the commenter does not have any comments on Subsection 4.12.6 of Section 4.12, Transportation and Traffic, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-46**

This comment expresses concern regarding the requirements of 450 spectators as the baseline for requiring an Event Traffic Management Plan, as required by Mitigation Measure 4.12.1.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

#### **RESPONSE I-8-47**

This comment indicates that the commenter does not have any comments on Section 4.13, Utilities, or Section 5.1 of Chapter 5.0, Alternatives, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-48**

This comment suggests deleting Project Objective 2 and expanding Project Objective 1 to read as follows:

“Redevelop the City-owned site of the former Belmont Pool with similar aquatic recreational purposes, consistent with the original ballot measure, while replacing the former Belmont Pool, a state-of-the-art, world-class facility when opened in 1968, with a more modern, state-of-the-art, world-class facility that better meets the needs of the today’s local community, region and State’s recreational and competitive swimmers, divers, aquatic sports participants, and additional pool users due to the tremendous demand for these services in the local community, region and State.”

The Project Objectives were developed with careful consideration by the City. While the suggested revision may improve the readability of the objectives, the City has decided to retain both Project Objectives 1 and 2.

**RESPONSE I-8-49**

This comment indicates that the commenter does not have any comments on Subsection 5.1.2, of Chapter 5.0, Alternatives, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

**RESPONSE I-8-50**

This comment states that the commenter is not aware that the “Fully Enclosed Pools Alternative” was ever requested by the members of the Stakeholders Committee and asks if it is necessary to include this Alternative in the Draft EIR.

While the Fully Enclosed Pool Alternative was not an alternative suggested to the City by the members of the Stakeholder Committee, Section 15126.6(c) of the *State California Environmental Quality Act (CEQA) Guidelines* requires that a project EIR analyze potential project alternatives that could accomplish most of the basic project objectives and avoid or substantially reduce significant environmental effects of the project. The Fully Enclosed Pool Alternative was considered by the City in its evaluation of reasonable project alternatives, but was ultimately considered infeasible because of its failure to meet most of the Project Objectives, its infeasibility, and its inability to avoid significant environmental impacts. Therefore, while this alternative was not requested by the members of the Stakeholder Committee, the City considered the Fully Enclosed Pool Alternative to ensure its compliance with CEQA in exhausting all possible project alternatives that could meet the Project Objectives while also reducing impacts to the environment.

**RESPONSE I-8-51**

This comment expresses support of the analysis contained in the Conclusion Subsection of Subsection 5.2.2. The comment goes on to state that in addition to the conclusion in this Subsection that alternative project locations would be infeasible for the proposed Project, the three alternative locations would also be infeasible because these sites are located in commercial areas, away from residential locations, and therefore would not be easily accessible for as many residents and users, whether on foot, on a bicycle, or in a car.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

### **RESPONSE I-8-52**

This comment indicates that the commenter would like to see the analysis in Table 5.A made stronger for some of the alternatives. The commenter goes on to provide suggested language to strengthen the alternatives analysis in Comments I-8-53 through I-8-58. Responses to Comments I-8-53 through I-8-58 are provided below. Therefore, no additional response to this comment is necessary.

### **RESPONSE I-8-53**

This comment suggests that the analysis for Alternative 1 could be strengthened by changing the second bullet point in the “Basis for Selection and Summary Analysis” Subsection from “Inconsistent with the majority of Project objectives” to “Inconsistent with 13 of the 15 Project Objectives.” The commenter also suggests adding a third bullet point that would read “Will reduce available aquatic recreational and training opportunities to a level below what was available with the former Belmont Pool.

While the editorial suggestion may help clarify the discussion or text, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

### **RESPONSE I-8-54**

This comment suggests that the analysis for Alternative 2 could be strengthened by moving the second bullet point in the “Basis for Selection and Summary Analysis” Subsection upward to become the first bullet.

While the editorial suggestion may help clarify the discussion or text, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

### **RESPONSE I-8-55**

This comment suggests that the analysis for Alternative 3 could be strengthened by adding three bullet points at the end of the “Basis for Selection and Summary Analysis” Subsection that would read as follows:

- The prevailing afternoon winds in Long Beach raise a safety issue for divers training on the 5- and 10-meter towers.
- Local divers training and competing on the tower apparatus now have to travel to Federal Way, Washington, or Colorado Springs, Colorado, to find an indoor diving facility that offers tower diving.
- An indoor diving facility with tower diving will replace what was on the site previously within the former Belmont Facility.

While the editorial suggestion may help clarify the discussion or text, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

#### **RESPONSE I-8-56**

This comment suggests that the analysis for Alternative 4 could be strengthened by adding a sixth bullet point at the end of the “Basis for Selection and Summary Analysis” Subsection section that would read as follows:

- Unable to provide adequate programmable space.

While the editorial suggestion may help clarify the discussion or text, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

#### **RESPONSE I-8-57**

This comment suggests that the text for Alternative 5 be revised to insert the word “much” in front of “lesser degree” in the sixth bullet point in the “Basis for Selection and Summary Analysis” to emphasize that this Alternative is not viable.

While the editorial suggestion may help clarify the discussion or text, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while the suggestion is acknowledged, no changes to the text have been made, and no further response is required.

#### **RESPONSE I-8-58**

This comment indicates that the commenter has no comments on Subsections 5.4.1 and 5.4.2 of Chapter 5.0, Alternatives, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-59**

This comment suggesting adding the word “fifteen” in front of the word “Project” in the first line of the first paragraph of Subsection 5.4.3 of Chapter 5.0, Alternatives of the Draft EIR, to read, “achieve two of the fifteen Project” within this sentence.

While the editorial suggestion may help clarify the discussion or text, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore,

while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

#### **RESPONSE I-8-60**

This comment suggests adding the word “vast” in front of the word “majority” in Subsection 5.4.4 in Chapter 5.0, Alternatives of the Draft EIR.

While the editorial suggestion may help clarify the discussion or text, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

#### **RESPONSE I-8-61**

This comment indicates that the commenter has no comments on Subsections 5.5.1 and 5.5.2 of Chapter 5.0, Alternatives, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-62**

This comment suggests revising the fifth and sixth lines of Subsection 5.5.3 of Chapter 5.0, Alternatives, of the Draft EIR as follows:

“Alternative 2 would maintain the pool facility in a location that would serve the existing users, although not to the same extent as the proposed Project, as no additional space for increased growth of aquatic activities would be gained (Objectives 4, 5, and 8).”

The comment also suggests underlining this addition for emphasis and visibility.

While the editorial suggestion may help clarify the discussion or text, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

#### **RESPONSE I-8-63**

This comment disagrees with the language in Subsection 5.5.4 of Chapter 5.0, Alternatives, which currently refers to the elimination of the indoor pool component as having “incrementally less” impacts than the proposed Project with the exception of land use and recreational impacts, which would be greater. The commenter opines that the elimination of the indoor pool would have a “huge impact” associated with the loss of recreational training opportunities the indoor

pool could provide. As such, the commenter asks if there is a better word than incrementally that could be used to describe the impacts associated with the elimination of the indoor pool.

While the editorial suggestion may help clarify the discussion or text, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

#### **RESPONSE I-8-64**

This comment indicates that the commenter has no comments on Subsections 5.6.1 and 5.6.2 of Chapter 5.0, Alternatives, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-65**

This comment notes that Page 5-23 of Chapter 5.0, Alternatives, of the Draft EIR indicates that the diving well would be located outside under Alternative 3 and then later notes that space constraints would require the consolidation of pools. The commenter asks for clarification as to whether or not Alternative 3 proposes that the diving well be located outside or that the pools be consolidated. The comment goes on to express confusion regarding the use of the term “consolidation” as it is unclear if this refers to the inclusion of the diving well outside with the outdoor pool or if it implies that there would be a stand-alone diving well. The commenter concludes by expressing preference for a stand-alone diving well over an outdoor pool with a diving area due to temperature variations needed for divers versus swimmers.

Page 5-23 of Chapter 5.0, Alternatives, has been revised as follows:

“However, because Alternative 3 would relocate the diving well to the outdoor pool component, space constraints would require the ~~consolidation of pools and~~ removal of the divers’ whirlpool and the loss of an indoor competitive diving facility.”

This revision will be incorporated in the Errata to the Final EIR and does not change the analysis or conclusions contained in the Draft EIR. Therefore, no further response is necessary.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which does include an outdoor diving well component.

#### **RESPONSE I-8-66**

This comment suggests revising the third paragraph of Subsection 5.5.3 of Chapter 5.0, Alternatives as follows:

“Competitive Divers and certain competitive events prefer indoor competitive facilities over outdoor facilities because due to the vagaries of weather, a consistent air temperature is ideal.”

While the editorial suggestion may help clarify the discussion or text, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

#### **RESPONSE I-8-67**

This notes that the former Belmont Pool facility offered one of three indoor diving areas with tower diving equipment in the Western United States with the other two facilities being located in Federal Way, Washington, and Colorado Springs, Colorado.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-68**

This comment asks whether or not a high variance would be needed for an outdoor 10-meter diving tower as that it would exceed the 30 ft height limit.

The proposed Project requires a single height-related variance. This variance will encompass all Project components that are in excess of the 25 ft/30 ft height maximums established in the City’s Zoning Code. Specific Project components that would be above the height maximum are the proposed bubble structure and, were it included in the Project, the outdoor dive tower (as proposed under Alternative 3).

#### **RESPONSE I-8-69**

This comment states that an outdoor 10-meter diving tower will require another structure to accommodate the tower equipment and associated stairs, which may have a negative impact on views.

As discussed further in Section 4.1, Aesthetics, of the Draft EIR, the proposed Project would not result in significant impacts related to the obstruction of a scenic vista. The diving tower considered in the aesthetic analysis considered the height of the proposed dive tower, which has been designed to include all required structural components, including the area proposed for the tower equipment and stairs. As described in Section 4.1, Aesthetics, the proposed placement and alignment of the Project would allow for increased views of the coastline that were previously blocked by the former Belmont Pool. Therefore, while the 10-meter dive tower could slightly alter views in the post-Project condition, this Project component would not result in a substantial adverse effect on a scenic vista, and impacts to a scenic vista could continue to be less than significant.

### **RESPONSE I-8-70**

This comment asserts that Alternative 3, Outdoor Diving Well/Revised Site Plan, does not demonstrate any appreciable difference for the overall project except that noise levels will be increased and it would be less user-friendly.

The comment regarding an outdoor diving facility being less user-friendly is acknowledged. As described further in Chapter 5.0, Alternatives, of the Draft EIR, environmental impacts associated with Alternative 3 would be incrementally less than the proposed Project, with the exception of noise impacts, which would be greater. Despite incrementally reducing environmental impacts associated with the Project, Alternative 3 was determined to meet only a few of the Project Objectives, and to a lesser degree than the Project. For these reasons, Alternative 3 was not identified as the Environmentally Superior Alternative nor was Alternative 3 identified as the Preferred Alternative.

### **RESPONSE I-8-71**

This comment suggests revising the last sentence on Page 5-25 of Chapter 5.0, Alternatives, of the Draft EIR as follows:

“A height variance would still be required under this alternative ~~due to the indoor diving well.~~”

While the editorial suggestion may help clarify the discussion or text, this comment does not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

### **RESPONSE I-8-72**

This comment indicates that the commenter has no comments on Subsection 5.7.2 of Chapter 5.0, Alternatives, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

### **RESPONSE I-8-73**

This comment suggests revising the fifth and sixth lines of the first full paragraph on Page 5-29 of Chapter 5.0, Alternatives, of the Draft EIR as follows:

“...pool complex would not be able to ~~hold as many special events and offer as~~ many public aquatic opportunities or hold as many special events...”

This comment also suggests carrying over this revision to the third paragraph in Subsection 5.8.3.

While the editorial suggestions may help clarify the discussion or text, the comments do not raise questions, concerns, or issues related to the analysis contained in the Draft EIR. Therefore, while such suggestions are acknowledged, no changes to the text have been made, and no further response is required.

#### **RESPONSE I-8-74**

This comment indicates that the commenter does not have any comments on Subsection 5.8.1 or 5.8.2 of Chapter 5.0, Alternatives, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

#### **RESPONSE I-8-75**

The comment questions how the Reduced Project-No Diving Well and No Outdoor Components Alternative (Alternative 5) can increase programmable water space to minimize scheduling conflicts with the reduction of pools under this Alternative. The commenter goes on to note that the reduced outdoor pools would result in a decrease of water surface area than was previously included as part of the former Belmont Pool facility.

The commenter is correct in that Alternative 5 would not increase programmable water space. As such, Pages 5-35 and 5-36 of Chapter 5.0, Alternatives, have been revised as follows:

“Although Alternative 5 would redevelop and replace the former Belmont Pool with a more modern facility that better meets the needs of recreational and competitive swimmers, divers, and aquatic sports participants, (Objectives 1, and 2), ~~and increases programmable water space to minimize scheduling conflicts (Objective 5),~~ it does not meet these objectives to the same degree as the proposed Project. Alternative 5 provides only 200 sf more pool area than the former Belmont Pool facility, and is 49 percent less pool area than the proposed Project. The small increase in pool area would not alleviate the overcrowding and schedule conflicts of the former Belmont Pool as compared to the proposed Project (Objective 5).”

#### **RESPONSE I-8-76**

This comment indicates that the commenter has no comments on Chapter 6.0, Long-Term Implications, or Subsection 7.1 of Chapter 7.0, Mitigation, Monitoring, and Reporting Program (MMRP), of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

### **RESPONSE I-8-77**

This comment opines that the definition of a “large special event” is too low for the Project, as no such plan was ever required during the life of the former Belmont Pool facility, which the commenter opines routinely had more than 450 spectators without the need for such a plan. The commenter goes on to note that if this plan is truly needed, then the definition of a special event needs to be redefined to be consistent with the minimum number of permanent seats to be provided by the Project.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

### **RESPONSE I-8-78**

This comment indicates that the commenter has no comments on Chapter 8.0, List of Preparers, or Chapter 9.0, References, of the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

### **RESPONSE I-8-79**

This comment expresses support for approval of the EIR and the proposed Project and indicates that the commenter’s suggested edits and comments on the Draft EIR are detailed because the commenter intends to improve the Project and strengthen the analysis made in the Draft EIR. The commenter concludes by expressing admiration for the analysis in the Draft EIR and the work that has been put forth into the document by all parties involved in its creation.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. Therefore, no additional response is necessary.

**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Monday, June 13, 2016 9:57 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont Pool

-----Original Message-----

From: Tra [<mailto:trapilates@yahoo.com>]  
Sent: Thursday, June 09, 2016 10:13 PM  
To: Craig Chalfant  
Subject: Belmont Pool

I have two areas of concern with the proposed Belmont Pool

1) The plan includes just 1,250 permanent seats for the indoor pool. It is my understanding that 1,500 seats are required for NCAA events and other world class diving events. Why would we build a pool that doesn't have enough seats to draw the appropriate events to the pool? What a waste!!! Why even build it if we aren't going to build it to be world class and provide potential income to the City in the form of sales tax & tourism from these large events.

I-9-1

2) In Section 5.3 ALTERNATIVES UNDER CONSIDERATION:

Alternative 3 indicates that moving the diving well outdoor remains under consideration. That would be ridiculous, more expensive, would also not attract world class diving events and would decrease the potential earning potential of the proposed pool. The diving well MUST be indoors as agreed upon and voted upon by the City Council in 2014 after hearing testimony of experts in the field.

I-9-2

Thank you for your time and consideration.

Tracy Barden MPT  
Core Pilates Center

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**TRACY BARDEN**

**LETTER CODE: I-9**

**DATE: June 9, 2016**

**RESPONSE I-9-1**

This comment expresses concern about the seating capacity for the indoor pool component of the proposed Project. The comment further notes that 1,500 seats are required for National Collegiate Athletic Association (NCAA) or other world class diving events.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final Environmental Impact Report (EIR) for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-9-2**

This comment expresses concern for the outdoor diving well included in Alternative 3. The commenter states that the proposed Project must include an indoor diving well as voted by the City Council in 2014.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Monday, June 13, 2016 10:03 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Long Beach Aquatic Center

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**From:** Donald Leas [mailto:donleas@hotmail.com]  
**Sent:** Thursday, June 09, 2016 5:06 PM  
**To:** Craig Chalfant  
**Cc:** Steve Foley; Linda Paul  
**Subject:** Long Beach Aquatic Center

Craig Chalfant, Senior Planner  
City of Long Beach

Dear Mr. Chalfant:

I have been asked to offer some comments concerning the progress of the Aquatic Center for the City of Long Beach. I had the privilege of attending your community meeting on Saturday, April 9<sup>th</sup> at the Golden Sails Hotel in Long Beach. At the meeting, I had the opportunity to meet and speak with many people about the proposed Belmont Pool design. I found it very informative and was glad to see the city keeping its citizens informed of the developments and to give them the opportunity to ask questions to the various speakers. I also spoke personally with the architect during my visit.

Let me give you a little history of my extended background in the field of aquatics and especially in the sport of diving. I started in swimming competition in 1943 and in diving competition in 1950. I have coached both swimming and diving at the high school, university, YMCA, and club level since 1957. I have been a consultant to and for FINA, USA Diving, the NCAA, and the National Federation of High Schools for over 35 years. In 1995 I ran the FINA World Cup and in 1996 I ran the diving competition at the Atlanta Olympic Games where I also oversaw the construction of the Georgia Tech Aquatic Center. I was national chairman of USA Diving (then called the AAU) in the middle 70s and a member of the Executive Committee of the United States Olympic Committee. For eight years I was national chairman of the women's national collegiate committee for swimming and diving. I am currently, since 1981, the international chairman of the World University Games diving committee. I was the consultant for the revised diving well at the United States Air Force Academy and the designer of the premiere high school diving well in the country at the Northside Independent School District in San Antonio where they have eight springboards and a full diving tower with 1, 3, 5, 7.5, and 10 meter platforms.

I have read through the Draft Environmental Impact Report and find it very extensive and inclusive but which has raised some questions and concerns. First, I specifically would like to address Alternative 3, the moving of the diving well to be outdoors.

It is a fact that with an outdoor diving facility there will be a significant increase in the cost of maintaining the

I-10-1

I-10-2

I-10-3



water level, an increase in chlorine usage, and an increase in the heating requirement to keep the water at the optimum level required for diving training and competition. The FINA Handbook states that "The water temperature shall be not less than 26 degrees Celsius" (FR 5.3.9). That is about 80 degrees Fahrenheit. Additionally, there will be an increase in the cost of providing lighting for training and competition at night, especially during the long winter nights; a need for seating, whether it be permanent or temporary, since it will not be able to utilize the indoor seating; and the increased cost of keeping an outdoor pool clean because of the outdoor environment.

I-10-3

Second, I see absolutely no reason why it is suggested that the 115 square foot whirlpool for divers be eliminated. Because you can save 115 sf of deck space is ludicrous? These whirlpools (hot tubs) are generally located on the deck behind the diving platform or at the sides of the deck at the diving end of the pool. In fact, it is more important that the whirlpool be present in an outdoor facility because of the various temperature changes that exist in the outdoor environment in Long Beach. It is well known that the NCAA collegiate diving championships in the West are held every year in Seattle, Washington, even though the swimming portion of the conference championships are held at different pools within the conference. This meet will never move to the LA area if the diving well is moved outdoors. All of the conference schools would prefer to move to your area. These include USC, UCLA, Arizona State, U of Arizona, UC Berkeley, and Stanford, among others, the areas where most divers in these schools grow up, start their diving careers, and would like to be seen by their local friends.

I-10-4

Another concern I have if the diving well is moved outdoors is to what direction will the springboards and platforms be facing? I have had extensive experience with this problem in a number of facilities. In Atlanta, at the Olympic Games, the architect felt that there would not be a problem with facing the diving equipment west because he was providing for a roof overhead that was 100 feet above the deck with the ends and sides open. I don't know if you have ever tried to look east on a clear day between the hours of 8 in the morning till about 11:30, but you are blinded by the sun and the divers were not able to do their dives properly on backward takeoffs. Additionally, when looking west from about 3 in the afternoon to 7:30 in the evening you are again blinded by the sun on forward facing dives. Once this was discovered and demonstrated to the Organizing Committee I required them to hang a large curtain (100 feet high and 100 feet wide) at both ends of the facility to block the sun. When I am asked by USA Diving to approve a site for an international diving event I will reject any outdoor diving well that has the diving equipment facing any way but north.

I-10-5

If you want a first class facility that the City of Long Beach can again be proud of it should be 25 meters wide. That is only 7 feet wider than a 25 yard pool. This will allow for three 3 meter springboards, two 1 meter springboards, and a platform with 1m, 3m, 5m, 7.5m, and 10m in height. This is the standard required for World Championships and the Olympic Games and I understand that there is talk of LA again bidding for the Games.

I-10-6

Another concern I have is with the proposed number of seats, whether indoors or outdoors. Do you realize that I had 11,000 seats in Atlanta for the Olympics and we took in one million dollars (\$1,000,000) each time we had a swimming or diving event. That is an average of less than \$100 a ticket. I know that you will not be able to provide 11,000 seats but I really believe you are being foolish in suggesting only 1250 seats. At least 1,500 or 2,000 seats will bring in a significant amount of money over the years and will pay for themselves very quickly and will attract more events if more spectators can be accommodated.

I-10-7

If the diving well is moved outdoors as proposed in Alternative 3, it will necessitate that the building structure for the indoor pool will have to be reduced in length, thus automatically reducing the number of seats indoors, unless of course you would raise the roof so as to bring all of the 1250 seats adjacent to the swimming pool.

I-10-8

However, it is stated in Alternative 3 that the roof could be lowered if the diving well is moved outdoors. Now I see a conflict in the rationale for moving the diving well outdoors. You will either have fewer seats or you will raise the roof indoors. Which is it?

I-10-8

I see that the building height is planned to be 71' in height. My question is whether this is 71 feet above the current ground level or 71 feet above the deck? I understand that the environmental people are requiring the facility to be elevated approximately 7 feet above the current street or ground level. With respect to a 10 meter platform we only need 50 feet. Actually, a minimum of 44 feet (14 meters) and a preferred distance 49 and a quarter feet (15 meters) above the deck to the ceiling is shown in the FINA, USA Diving, and NCAA regulations. Can this 71 feet in height be explained more precisely?

I-10-9

I do not believe that enough of these disadvantages were included or evaluated properly during the presentation made in the Alternative 3 discussion.

I-10-10

I hope that this analysis of the aspect of moving the diving facility outdoors is helpful in disqualifying the continued discussion of this Alternative 3. It may be penny wise but it is definitely dollar foolish.

Respectfully yours,

Donald Leas  
2632 Forest Dr.  
Mayport, PA 16240  
928-978-2168

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**DONALD LEAS**

**LETTER CODE: I-10**

**DATE: June 9, 2016**

**RESPONSE I-10-1**

This comment is introductory in nature and notes the commenter's experience in the field of aquatics.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. No further response is necessary.

**RESPONSE I-10-2**

This comment notes that the commenter read through the Draft EIR and questions and comments on the environmental document. Refer to the Responses to Comments I-10-3 through I-10-10.

**RESPONSE I-10-3**

This comment addresses constraints to Alternative 3, which would locate the diving well outside of the proposed Bubble structure. The commenter notes constraints related to maintaining an outdoor diving pool as compared to an indoor pool.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

**RESPONSE I-10-4**

This comment questions the elimination of the 115 square foot (sf) whirlpool for divers. The commenter notes that the whirlpools are generally located behind the dining platform and are especially important if the diving well is located outdoors. The comment concludes by noting the relevance of an indoor diving well for attracting National Collegiate Athletic Association (NCAA) events.

As described in Chapter 3.0, Project Description, the proposed Project includes a 4,205 sf indoor dive pool, which would range from 16 to 17 ft deep. Additionally, an indoor dive spa pool/whirlpool would be located adjacent to the Dive Pool and would be approximately 115 sf and 3 ft deep.

For a discussion of the evaluation of Alternatives under the California Environmental Quality Act (CEQA), refer to Chapter 5.0, Alternatives, of the Draft EIR. The 115 sf whirlpool for divers would not be included under Alternative 3. It is important to note that the elimination of the whirlpool and other outdoor Project components under this Alternative was considered as

part of the City's efforts to identify a feasible alternative that would meet the Project Objectives while also reducing Project impacts. Alternative 3 was ultimately determined to only incrementally reduce impacts, but would not meet several of the Project Objectives. For this reason, Alternative 3 was not identified as the Preferred Alternative or the Environmentally Superior Alternative.

#### **RESPONSE I-10-5**

This comment expresses concern for the orientation of the diving well if it is located outdoors.

For a discussion of the evaluation of Alternatives under CEQA, refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR.

#### **RESPONSE I-10-6**

The commenter states that a "first class" aquatic facility should be 25 meters wide.

The outdoor 50-meter pool is 25 meters wide. This outdoor pool is where large meets, such as NCAAs and World Championships would take place. The 50-meter indoor pool is 25 meters wide. As such, a little more than 7 inches would need to be added to this pool width to make it 25 meters wide, which would cut down on deck space.

#### **RESPONSE I-10-7**

This comment describes the economic benefits of a large seating capacity. The commenter notes that increasing the seating capacity to 1,500 or 2,000 seats would increase the economic revenue of the proposed Project.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

#### **RESPONSE I-10-8**

This comment questions the proposed improvements under Alternative 3. The commenter makes specific reference to the rationale for moving the diving well outdoors under Alternative 3.

As described in Chapter 5.0, Alternatives, relocating the diving well outdoors would allow for a reduction in the height of the proposed Bubble structure. All other components, including the proposed indoor seating capacity, would be included in Alternative 3. It should be noted CEQA requires the consideration of alternatives to the proposed Project or its location that are capable of avoiding or substantially lessening any significant effects of the proposed Project.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

#### **RESPONSE I-10-9**

This comment requests further clarification about the height of the proposed Bubble structure and the reasoning for this height.

The building height is described as being 71 feet (ft) throughout the Draft EIR. While the building height will be 71 ft, this height is in reference to the plinth, which itself is located 7 ft above existing grade. As such, the total height of the building above the existing grade would be 78 ft at its apex (refer to Figure 4.7.1, North Elevation Comparison, in Section 4.1, Aesthetics, of the Draft EIR), a total of 19 ft higher than the previous facility.

Although the building height is described as 71 ft throughout the Draft EIR, this change will be and does not change the analysis or conclusions contained in the Draft EIR as impacts with respect to aesthetics were based on the view simulations created for the Project (refer to Section 4.1, Aesthetics, of the Draft EIR), which correctly assumed a building height of 78 ft. This change will be incorporated in the Errata to the Final EIR. Therefore, no further response is necessary.

#### **RESPONSE I-10-10**

The commenter states that the evaluation of Alternative 3 did not properly disclose the disadvantages of moving the diving well outdoors. The comment concludes by asserting that Alternative 3 should be disqualified from further consideration.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Monday, June 13, 2016 9:24 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont Pool Draft EIR Comment

**From:** Edric Guise [<mailto:efguise@gmail.com>]  
**Sent:** Friday, June 10, 2016 4:44 PM  
**To:** Craig Chalfant  
**Cc:** Suzie Price; Jack Cunningham  
**Subject:** Belmont Pool Draft EIR Comment

Hello Mr. Chalfant-

Thanks for the opportunity for comment on this subject. Here are my points and questions.

1. I support the high level of energy efficiency designed into the current plan. The Global Climate Change section of the DEIR mentions a number of California and Long Beach laws, regulations and programs that support such efficiency in addition to increasing use of clean, alternative/renewable energy. | I-11-1
2. Clean renewable energy should be added to the project wherever practical. It appears the roof doesn't lend itself to solar panels but there are other areas throughout the project where solar panel shade should be practical. A few small wind turbines may also be practical and can be a good architectural feature. | I-11-2
3. Clean onsite energy like a cogeneration fuel cell system should be added to the project similar to the fuel cell system now being added to the Aquarium of the Pacific in Downtown Long Beach. Microturbines or IC engines fueled by natural gas may also work, but fuel cells are the cleaner alternative. Such cogeneration systems are in place at large pools all over the world, can significantly reduce the project's energy consumption and pollution, and will save money while increasing other project values to the community. | I-11-3
4. A cogeneration system will increase the community project value by making the project a safe harbor community space in the event of natural disaster. The project will be one of the few East Long Beach structures designed to withstand a major earthquake and a cogeneration system can provide energy for medical and other critical emergency services that may otherwise be unavailable due to an electric grid failure. The City and State of New York learned this lesson during the aftermath of Hurricane Sandy when they didn't have enough public safety areas or hospitals with an onsite energy supply. As a result that City and State are now promoting onsite cogeneration systems to support critical public facilities, and we have such an opportunity here with this project. | I-11-4
5. The cost, risk and operations/maintenance of energy equipment like solar panels, small wind turbines and cogeneration systems are commonly borne by experienced third party developers and investors who recuperate their investment by selling the energy to the facility at a discount compared to utility prices. The fuel cell cogeneration system now being added to the Aquarium of the Pacific is one such example, where the Aquarium does not pay for the system but instead purchases the energy with a Power Purchase Agreement contract. This means there is no need to increase the cost of the project in order to benefit from these onsite energy systems/options. | I-11-4
6. Major public/private projects often overlook this issue of clean/renewable onsite energy except where designing in the minimal use of such equipment is used to help qualify for LEED (i.e., green building) | I-11-5

certifications. Another reason this is overlooked is because project proponents and designers focus more on the initial cost of a project and less on the ongoing operations/maintenance costs. In this case Long Beach and this project have the ability to aim higher, support our State and City's laws/regulations/goals for more clean/renewable energy, create an important public safety resource, and save money from reduced energy costs.

I-11-5

- 7. Finally, the former Belmont Pool included a mid-size restaurant licensed for alcohol and music entertainment. Such entertainment licenses are increasingly rare for public establishments in Long Beach and elsewhere and are an important means of support for local musicians/artists. In addition, like the nearby Belmont Brewing Company a restaurant is another way for residents from all over Long Beach and tourists to enjoy the new project, Belmont Pier and adjacent beach resources. The music was and can again be part of the attraction that can help this project and the immediate area achieve Long Beach's broader vision of creating a thriving public space that nonetheless respects the local residents. If a larger restaurant isn't possible the project should include a moderately sized outdoor stage and seating area for concerts and other public events. We need to support artists, attract tourists and connect with the rest of our great City.

I-11-6

Thank you for your consideration.

Regards,  
 Edric  
 Guise  
 126 Belmont Avenue  
 Long Beach, CA 90803

## **EDRIC GUISE**

**LETTER CODE: I-11**

**DATE: June 10, 2016**

### **RESPONSE I-11-1**

This comment supports the energy efficiency included in the design of the proposed Project and notes that the Global Climate Change section of the Draft includes a number of applicable laws, regulations, and programs supporting efficiency and clean, alternative/renewable energy.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. No further response is necessary.

### **RESPONSE I-11-2**

This comment recommends that renewable energy options should be added to the proposed Project where practical. The commenter makes specific reference to solar panels and wind turbines.

Due to the curved nature of the Bubble structure and its ancillary facilities and the layout of the proposed facilities on the Project site, it would be infeasible to include solar panels on the Project facilities and/or wind turbines on the Project site.

### **RESPONSE I-11-3**

This comment recommends the addition of clean on-site energy such as a cogeneration fuel cell system to address energy consumption and pollution. The commenter also asserts that a cogeneration fuel cell system would enable the proposed Project to be a public safety area for use during natural disasters because it would be able to operate during emergency situations.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

### **RESPONSE I-11-4**

This comment states that the cost, risk, and operation/maintenance of energy equipment like solar panels, wind turbines, and cogeneration systems are borne by third-party developers and investors. The comment also references the fuel cell cogeneration system at the Aquarium of the Pacific as an example of an instance where the Aquarium did not purchase the fuel cell system, but instead purchased the energy with a Power Purchase Agreement. The comment concludes by arguing that the use of such systems would negate the need to increase the cost of the proposed Project in order for the Project to benefit from these on-site energy systems/options.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

#### **RESPONSE I-11-5**

This comment opines that major public and private project overlook clean/renewable energy (unless the use of such equipment is required to qualify for a Leadership in Energy and Environmental Design [LEED] certification) because project proponents focus on the initial cost of a project and less on operation/maintenance costs. The commenter urges the City to further applicable State and local laws, regulations, and goals aimed at promoting renewable energy by including such features in the proposed Project.

For the reasons described above in Responses I-11-1 through I-5-4, it would be infeasible to include solar panels on the Project facilities and/or wind turbines on the Project site. While these features were determined to be infeasible, the proposed Project does include several Conservation and Sustainability Features aimed at reducing energy consumption. For example as described in Chapter 3.0, Project Description, the Project includes aquatic specific pumps that would be in constant communication with the filtration system and chemical controller to provide the optimum electrical frequency to the pump to ensure that the aquatic pumps would be kept at premium levels of efficiency, thereby reducing energy consumption by at least 30 percent. The proposed Project would also utilize light-emitting diode underwater pool lighting and pool blankets to further reduce energy usage. The use of these features would serve to reduce energy consumption, thereby reducing operation/maintenance costs and furthering the City's ability to meet applicable laws, regulations, and goals aimed at increasing energy efficiency.

#### **RESPONSE I-11-6**

The commenter opines that the former Belmont Pool facility included a mid-size restaurant licensed for alcohol and music entertainment. The commenter notes that such entertainment uses can serve to bring the community and visitors to the community together. As such, the commenter notes that the proposed snack bar included as part of the Project should be larger and if that is not possible, should include an outdoor stage and seating area for concerts and other public events to support artists, attract tourists, and connect with the rest of the City.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Monday, June 13, 2016 9:29 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Support for Belmont Aquatic Center

**From:** Merritt Morris [<mailto:merrittjmorris@gmail.com>]  
**Sent:** Friday, June 10, 2016 1:54 PM  
**To:** Craig Chalfant  
**Subject:** Support for Belmont Aquatic Center

Mr. Craig Chalfant,

As a Long Beach resident, homeowner and aquatic community member I am in support of rebuilding the Belmont Aquatic Center Complex. I am eager to see a world class center that will attract high level aquatic competition. However, there are some issues with the current proposal.

I-12-1

The proposed center indoor seating is a bit shy of the expected 1500 seat permanent capacity for holding top level aquatic competitions. If the planned capacity is increased Long Beach can potentially attract more aquatic events and thus generate more revenue to cover the cost of facility operations.

I-12-2

The proposed alternative plans also do not meet the center objectives as had been outlined and approved unanimously by the City Council on October 21, 2014. Alternative 3 should include an indoor diving component as necessary for high level competition and training. There is no such existing facility in the State of California that currently meets this requirement.

I-12-3

Thank you,  
Merritt Morris

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## **MERRITT MORRIS**

**LETTER CODE: I-12**

**DATE: June 10, 2016**

### **RESPONSE I-12-1**

This comment is introductory in nature and notes the commenter's support for rebuilding the Belmont Aquatic Center Complex. The commenter does express concern related to proposed Project. These concerns are outlined in Comments I-12-2 and I-12-3.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

### **RESPONSE I-12-2**

This comment raises concern with the proposed seating capacity of the proposed Project. The commenter suggests that increasing capacity can attract more events and result in revenue for the City, which could be used to cover facility costs.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

### **RESPONSE I-12-3**

The commenter asserts that the Project Alternatives do not meet the objectives outlined and approved by the Long Beach City Council on October 21, 2014. The commenter further recommends that Alternative 3 should include an indoor diving component.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Monday, June 13, 2016 9:32 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont

**From:** [johnmclareninsinc@gmail.com](mailto:johnmclareninsinc@gmail.com) [<mailto:johnmclareninsinc@gmail.com>]  
**Sent:** Friday, June 10, 2016 12:35 PM  
**To:** Craig Chalfant  
**Subject:** Belmont

I support the new pool

I-13-1

Sent from my Verizon 4G LTE Smartphone

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**JOHN MCLARENINSINC**

**LETTER CODE: I-13**

**DATE: June 10, 2016**

**RESPONSE I-13-1**

This comment expresses support for the proposed Project.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Monday, June 13, 2016 9:48 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Long Beach Aquatic Center

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**From:** Steve Foley [mailto:steve.foley@usadiving.org]  
**Sent:** Friday, June 10, 2016 7:06 AM  
**To:** Craig Chalfant  
**Cc:** Linda Paul; 'Donald Leas (donleas@hotmail.com)'; lucyjohnson1@gmail.com  
**Subject:** RE: Long Beach Aquatic Center

Dear Mr. Chalfant,

I would like to endorse our facilities expert, Mr. Don Leas comments with regards Long Beach Aquatic Center and Alternative 3. | I-14-1

The previous indoor aquatic center at Long Beach conducted numerous world class events and the main reason for this was that at the time, it was the only indoor pool in California and for that matter, on the entire West Coast. If Long Beach was to build a new facility and place the diving pool outdoors, then it would simply become one of many outdoor diving facilities to choose from for National and International competitions and therefore from a USA Diving perspective to conduct major event, Seattle would be our first choice. If we were looking for an outdoor venue to host an event, then Long Beach would be in the running with the soon to be developed and improved Mission Viejo, Stanford, USC, UCLA and even Tucson. | I-14-2

USA Diving is constantly looking for a world class venue to conduct major competitions, training camps and international events and in recent years, the West Coast has missed out due to not having a suitable indoor diving pool. I believe it would be a huge benefit for the community and the City of Long Beach to build the diving pool indoor with a seating capacity of 1,500-2,000 as Don mentioned. The economic benefits from hosting major events is substantial (USA Grand Prix previously in Ft. Lauderdale over 6 days benefited the City \$1,000,000) and the opportunity to have the ONLY indoor diving facility in California and being one of only two on the West Coast automatically gives the City of Long Beach a massive advantage over all other facilities. | I-14-3  
| I-14-4

As previously unanimously approved by the City Council in 2014 to construct a world class indoor diving facility, I would endorse this original proposal and trust that none of the 5 alternatives under consideration are accepted. | I-14-5

Yours sincerely,

Steve Foley  
 High Performance Director  
 USA Diving

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**From:** Donald Leas [mailto:donleas@hotmail.com]  
**Sent:** Thursday, June 9, 2016 8:06 PM

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**STEVE FOLEY**

**LETTER CODE: I-14**

**DATE: June 10, 2016**

**RESPONSE I-14-1**

This comment expresses agreement with Don Leas's comments regarding the City of Long Beach (City) Aquatic Center and Alternative 3. The referenced comments by Don Leas are responded to in Responses to Comments I-10-1 through I-10-10.

**RESPONSE I-14-2**

This comment provides a brief history on the relevance of the previous Long Beach Aquatic Center in the aquatic community, and further notes existing outdoor aquatic venues that would be similar to the proposed Project.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-14-3**

This comment suggests that the proposed Project should include a seating capacity of 1,500–2,000 spectators at the indoor diving pool in order to attract major competitions, training camps, and international events.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-14-4**

This comment notes that hosting major aquatic events would result in economic benefits for the City. The commenter further notes the advantage of an indoor diving facility in attracting large aquatic events.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-14-5**

This comment expresses support for an original proposal for the indoor diving facility previously approved by City Council in 2014. The comment further recommends that none of the five Project Alternatives under consideration are accepted.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Monday, June 13, 2016 9:12 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: EIR for Belmont Pool

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**From:** Debby McCormick [<mailto:diventenis@aol.com>]  
**Sent:** Saturday, June 11, 2016 3:55 PM  
**To:** Craig Chalfant  
**Subject:** EIR for Belmont Pool

June 11, 2011

Dear Mr Chalfant,

I would like to address a few items covered in the draft EIR for the new Belmont Pool project.

I-15-1

Incidentally, my family moved to Long Beach in 1969 so I would have a world class diving facility to train in, and due to access to that facility I became a National Platform Champion and a medallist at the Pan American Games.

The new plans call for 1250 seats, which is not enough for major competitions. I encourage you to consider minimally 1500 seats for spectators and athletes. The old pool had the capacity to seat 2000.

I-15-2

Please do not even consider moving the diving pool outdoors for so many reasons. The City Council voted unanimously, twice to have a separate diving well with platforms INDOORS. An outdoor option is unacceptable. Not only would it be more costly to clean and maintain proper pool temperatures, it would require adequate lighting at night, and have a lack of seating. There are no other indoor platform diving facilities in California. A site like this will attract not only the local population of the greater LA area to learn one of the most popular Olympic sports, it will give an opportunity for Long Beach to develop our future Olympic hopefuls and maintain the great tradition of ALL of our aquatic sports in Long Beach.

I-15-3

As far as the parking, there are over 1000 parking spaces on either side of the structure.

I-15-4

I am writing this letter as a former US National Champion, Pan Am Games Medallist, a Board member of the Aquatic Capital of America and a member of the Long Beach Century Club that wholly supports these items. I-15-5

Sincerely,

*Debby McCormick*

[www.mccormickdivers.com](http://www.mccormickdivers.com)

“Making a Splash Since 1968”

**DEBBY McCORMICK**

**LETTER CODE: I-15**

**DATE: June 11, 2016**

**RESPONSE I-15-1**

This comment is introductory in nature and notes the commenter's residency in the City of Long Beach and history in aquatics.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. No further response is necessary.

**RESPONSE I-15-2**

This comment suggests the proposed facility include 1,500 seats for spectators, rather than the 1,250 seats included in the proposed Project. The commenter further notes that the previous facility had a 2,000-seat capacity.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-15-3**

This comment objects to the consideration of moving the diving component outdoors, as proposed under Alternative 3. The comment notes that the City Council previously voted on two separate occasions to have an indoor diving well. The commenter further describes constraints related to an outdoor diving well and the local and regional attraction of an indoor diving facility.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

**RESPONSE I-15-4**

This comment state that there over 1,000 parking spaces on either side of the proposed Project.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

### **RESPONSE I-15-5**

This comment notes the commenter's history in aquatics and the organizations that endorse the comments included in this letter.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

June 11, 2016

Craig Chalfant  
Senior Planner  
City of Long Beach  
Developmental Services/Planning Bureau

Re: Belmont Pool Project and EIR

Dear Mr. Chalfant:

I wish to address 3 critical items covered in the EIR Plaza Pool Project, however I would like to give you my "background" credentials:

- A native of Long Beach, California for 82 years
- Water Polo and Swim Coach for L.B. Poly H.S. and Millikan H.S. 10 years Long Beach Unified School District (20 yrs.)
- Chief of Long Beach Life Guards (10 yrs.) Manager of the Tidelands Marine Bureau (responsible for beaches, Marinas and the Plaza Pool).
- President of the Long Beach Lifeguard Association Alumni
- Past President of the L.B. Aquatic Capital of America (2015-2016)
- Original "stakeholder" on the Plaza Pool Project

I-16-1

With that said, I would like to address these specific items in the EIR, they are:

- Seating .... 2,000 not 1,250
- Diving well and towers.... Inside not outside or eliminated!

I-16-2

Parking .... ample metered parking on the East side and the West side of pool SEATING becomes a major issue to the sponsors of many national and international events, including the NCAA College, Jr. College, CIF high school swimming and water polo events, as-well-as national age group swimming and water polo, local and national competition. It would seem that these events would certainly be supported by the L.B. Business and Convention Bureau, as to, increased "room nights" as well as our local eating and entertainment located on E. 2<sup>nd</sup> street in Belmont Shore. To bring these aquatic events, and their support groups to Long Beach, we need the 2,000 seating in our "New Facility".

I-16-3

THE DIVING PLATFORM AND WELL cannot be eliminated because U.S. Diving Federation and U.S. Swimming combines the swim meet with the diving events. An "outside" diving tower and well would be subject to weather conditions. Our Westerly winds would not be appropriate for our divers to perform in such weather elements and ocean breezes!

I-16-4

PARKING, our parking lots on the East and West side of the project can handle the crowds that would be expected at these events, as-well-as providing revenue for the City of Long Beach. (Meter parking).

I-16-5

Please consider these three issues as the project goes forward!

I-16-6

Sincerely, Yours in LifeSaving,

Richard (Dick) Miller

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**RICHARD MILLER**

**LETTER CODE: I-16**

**DATE: June 11, 2016**

**RESPONSE I-16-1**

This comment is introductory in nature and provides background information on the commenter and the commenter's involvement in the aquatic community. This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. No further response is necessary.

**RESPONSE I-16-2**

This comment indicates that the commenter has three specific concerns related to the EIR, which are as follows: (1) the need for more permanent seats, (2) an indoor diving well as opposed to an outdoor diving well (as proposed under Alternative 3), and (3) the overabundance of parking at the pool. These comments are described in further detail and are responded to below in Responses I-16-3 through I-16-5.

**RESPONSE I-16-3**

This comment expresses concern related to the number of permanent seats provided by the proposed Project and opines that the Project should include at least 2,000 permanent seats to attract major national and international events.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-16-4**

This comment expresses concern related to the placement of the diving platform and well outdoors, as proposed under Alternative 3. The commenter opines that changing weather conditions and strong winds would render an outdoor diving platform and well an inappropriate option for divers utilizing the proposed Project.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

**RESPONSE I-16-5**

This comment expresses personal familiarity with operations at the former Belmont Pool facility when asserting that the existing parking lots on the east and west sides of the site can

accommodate vehicles traveling to the site during special events occurring during operation of the proposed Project.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

**RESPONSE I-16-6**

This comment asks the City of Long Beach to consider the aforementioned comments as the Project moves forward.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Monday, June 13, 2016 9:07 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont Plaza

**From:** Jack Simon [<mailto:jsimon7946@gmail.com>]  
**Sent:** Sunday, June 12, 2016 9:48 AM  
**To:** Craig Chalfant  
**Subject:** Belmont Plaza

Dear Sir, I am writing to you concerning the proposed plans for a completely renovated Belmont Plaza Pool.

First, a little about me. I am an American Swimming Coach's Association Hall of Fame coach, coached numerous Olympic swimmers and national champions, was an American Swimming Coaches Association President and also served three terms as a Board member of United States Swimming. Also, for a short time was the head coach of Shore Aquatics, placing an Olympian on the 96 team.

I-17-1

I am somewhat flabbergasted that there is even a debate about putting a FIRST CLASS facility in Long Beach. Long Beach has served as a mecca for all aquatic sports for many decades now. The area has produced Olympians in all aquatic sports.

That said, perhaps the most important part is the amount of money that all aquatic sports have brought to the Long Beach area. I am certain, that over the years this exceeds hundreds of millions of dollars. Between the old AAU, the U.S. Olympic Committee, now United States Swimming, Diving, Water Polo and Synchronized there have been hundreds of national, international competitions held at Belmont. Then look at the local competitions in all sports where participants come from all over southern California.

I-17-2

The above, at least to me, is obvious! A first class facility, serving all aquatic sports, is an income producer for the City of Long Beach, but most important is to the hotels, restaurants and other related businesses. While fully realizing that this is an expensive venture, over a period of years it more than makes up for that expense.

I most certainly hope you will consider the advice of the aquatic experts.

Sincerely

Jack Simon  
 International Swimming Coach

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**JACK SIMON**

**LETTER CODE: I-17**

**DATE: June 12, 2016**

**RESPONSE I-17-1**

This comment is introductory in nature and notes the commenter's background in the aquatics community.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. No further response is necessary.

**RESPONSE I-17-2**

This comment notes the history of aquatic events held at the former Belmont Pool and the economic benefits that would be afforded to the City of Long Beach if the proposed Project is constructed.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Monday, June 13, 2016 9:02 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont Pool

-----Original Message-----

From: Jake Jeffery [<mailto:jake@groundflesh.com>]  
Sent: Sunday, June 12, 2016 10:18 AM  
To: Craig Chalfant  
Subject: Belmont Pool

Dear Mr. Chalfant,

Not long ago, our beloved Belmont Pool was shut down and has left an absence in our community. I have so many memories of the dive platforms from growing up nearby and using them every summer. It was the pinnacle of Jr. Lifeguards for me! Nowadays, I would like my children to have the same wonderful experiences that I had as a child. Please remember what made those platforms unique was that they were the only indoor platforms around. My seven year old daughter has begun diving competitively and we currently have to travel outside of our neighborhood to practice and out of town to compete. By rebuilding the dive facility indoors, competitions could resume right here in our community and would be huge draw for Long Beach. That being said, I encourage you to increase the number of seats for spectators in the current plan. Water polo tournaments, swim events, and dive tournaments could each easily fill 1500 seats as this community breeds champions of all these sports and have remained quite popular in our city for decades. I thank you for your time and consideration of my concerns.

I-18-1  
I-18-2

Sincerely,  
Jake Jeffery  
Long Beach Resident (40 years)

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**JAKE JEFFERY**

**LETTER CODE: I-18**

**DATE: June 12, 2016**

**RESPONSE I-18-1**

This comment is introductory in nature and notes the importance of the indoor diving facilities of the former Belmont Pool.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-18-2**

The commenter expresses support for increasing the permanent seating capacity of the proposed Project to 1,500 seats for large aquatic events.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Monday, June 13, 2016 8:50 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont Aquatic Center

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**From:** Jeff Hoffman [<mailto:jhoffman@jeffhoffmanassociates.com>]  
**Sent:** Sunday, June 12, 2016 3:22 PM  
**To:** Craig Chalfant  
**Subject:** Belmont Aquatic Center

Hello Craig,

I have reviewed the EIR and I am in favor of the proposed plan for the building and site. Let's fund the money and build it! | I-19-1

Thanks,

Jeff Hoffman  
238 Campo Drive  
Long Beach, CA 90803

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**JEFF HOFFMAN**

**LETTER CODE: I-19**

**DATE: June 12, 2016**

**RESPONSE I-19-1**

This comment expresses support for the proposed Project.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Monday, June 13, 2016 1:32 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Olympic Aquatic Center-Long Beach

**From:** [albecarrie@aol.com](mailto:albecarrie@aol.com) [<mailto:albecarrie@aol.com>]  
**Sent:** Monday, June 13, 2016 1:15 PM  
**To:** Craig Chalfant; [albecarrie@aol.com](mailto:albecarrie@aol.com)  
**Subject:** Olympic Aquatic Center-Long Beach

Dear Mr Chalfant,

**As a Long Beach resident and supporter of McCormick Divers I am extremely supportive of a world-class aquatic center at the site of the Belmont Plaza Pool. Some thoughts on the plan include:**

I-20-1

The new plans call for 1250 seats, which is not enough for major competitions. I encourage you to consider minimally 1500 seats for spectators and athletes. The old pool had the capacity to seat 2000.

I-20-2

Please do not even consider moving the diving pool outdoors for so many reasons. The City Council voted unanimously, twice to have a separate diving well with platforms INDOORS. An outdoor option is unacceptable. Not only would it be more costly to clean and maintain proper pool temperatures, it would require adequate lighting at night, and have a lack of seating. There are no other indoor platform diving facilities in California. A site like this will attract not only the local population of the greater LA area to learn one of the most popular Olympic sports, it will give an opportunity for Long Beach to develop our future Olympic hopefuls and maintain the great tradition of ALL of our aquatic sports in Long Beach.

I-20-3

As far as the parking, there are over 1000 parking spaces on either side of the structure.

I-20-4

**A truly world-class facility will prove an invaluable benefit to Long Beach. I am positive you have considered the economic effects aquatic events will bring to Long Beach businesses and hotels. In addition, it will provide a source of civic pride--not to mention a much-appreciated source of tax revenue!**

I-20-5

**Let's move forward with the FULL plan!  
Thank you,  
Carol Ostberg**

676 Loma Avenue  
Long Beach, CA 90814  
(562) 305-2873

**CAROL OSTBERG**

**LETTER CODE: I-20**

**DATE: June 13, 2016**

**RESPONSE I-20-1**

This comment is introductory in nature and expresses support for the proposed Project.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. No further response is necessary.

**RESPONSE I-20-2**

This comment expresses concern that the 1,250 permanent seats included as part of the proposed Project are insufficient for hosting major competition, and as such, urges the City of Long Beach to consider at least 1,500 permanent seats as part of the Project.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-20-3**

This comment urges the City not to consider moving the outdoor diving well, as proposed under Alternative 3. The commenter notes that the City Council previously voted to have a separate diving well with platforms indoors. The commenter asserts that an outdoor diving well would be unacceptable because it would require increased maintenance costs, additional lighting at night, and would have a lack of seating. The commenter goes on to argue in favor of an indoor diving well because it would allow the Project to serve as a landmark within the City and State for all aquatic events, including diving.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

**RESPONSE I-20-4**

This comment asserts that there are over 1,000 parking spaces on either side of the Project site.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

### **RESPONSE I-20-5**

This comment expresses support for the proposed Project and notes that while implementation of the Project would have invaluable impacts on the City, it would also provide positive economic impacts to the City.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Monday, June 13, 2016 2:18 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: The proposal for the new swim complex in the Belmont area

**From:** Lyle Nalli [<mailto:lnalli66@gmail.com>]  
**Sent:** Monday, June 13, 2016 1:54 PM  
**To:** Craig Chalfant  
**Subject:** The proposal for the new swim complex in the Belmont area

Dear Craig and other important members

Looking over the proposals for the new swim complex is very encouraging;. I urge you and other decision making members not to underscore nor underestimate the full greatness of building this great facility.

| I-21-1

I notice under considerations is alternatives; Guys and gals please, make the pools as planned. INdoor 50m, dive tank etc and Outdoor 50m etc. Don't cut corners here. What little savings you think you'll make will be greatly outweighed by the annual potential loss you / we will have by not being able to host just about any swim competitions. Think BIG and think LONG TERM.

| I-21-2

Keep enough seating to host the NCAA div.I championships. If you can do that, then you can host just about any meet you want.

| I-21-3

I do like that you put the lane widths acceptable by FINA. thank you.

| I-21-4

Is there enough deck space around the pools?

| I-21-5

I lend my support to other's in the swimming and diving community that have maintained if not been or participated in, the tradition of Long Beach swimming history. This includes diving.

| I-21-6

Swimmingly yours,

Lyle Nalli

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**LYLE NALLI**

**LETTER CODE: I-21**

**DATE: June 13, 2016**

**RESPONSE I-21-1**

This comment expresses support for the proposed Project.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. No further response is necessary.

**RESPONSE I-21-2**

This comment urges the City of Long Beach (City) to not consider the outdoor diving well as a feasible alternative (Alternative 3) to the proposed Project.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

**RESPONSE I-21-3**

This comment requests that the proposed Project provide enough seating to host championship aquatic events.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-21-4**

This comment expresses favor with the lane widths proposed as part of the Project, as the commenter opines that these lane widths are consistent with FINA (Federation Internationale de Natation) requirements.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. No further response is necessary.

**RESPONSE I-21-5**

This comment asks if there is enough deck space around the pools.

It is recommended that pool decks be 18 to 20 feet (ft) in size for major facilities, such as those proposed at the Project. The pool decks provided near the indoor and outdoor pools are anticipated to meet these recommendations and would provide sufficient space for visitor

spectating and for temporary seating (i.e., bleachers) during special events at the site. As such, the deck space around the indoor and outdoor pools is anticipated to be adequate to serve visitors to the Project.

**RESPONSE I-21-6**

This comment expresses support for the proposed Project as it would serve the swimming and diving community in Long Beach.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. No further response is necessary.

**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Monday, June 13, 2016 2:22 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Comments on the Draft EIR for the proposed Belmont pool project

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**From:** Lucy Johnson [mailto:lucyjohanson1@gmail.com]  
**Sent:** Monday, June 13, 2016 12:49 PM  
**To:** Craig Chalfant  
**Cc:** Amy Bodek; Ashley Davis  
**Subject:** Re: Comments on the Draft EIR for the proposed Belmont pool project

Thank you for confirming receipt of my detailed comments.

As an addendum/summary of my earlier comments, here are my three greatest concerns...

1) The planned 1,250 permanent seats for the indoor structure are not enough for a world-class facility. There should be a minimum of 1,500 permanent seats, preferably more, so Long Beach can compete with other facilities for the larger events (other than Olympics, World Championships and Olympic Swim Trials).

2) Numbers 2-5 of the Alternatives Under Consideration should be eliminated from Section 5.3, as they do not meet the project objectives, nor are they in line with the unanimous City Council votes for the project on both February 12, 2013 and October 21, 2014. Those four alternations should be moved to Section 5.2, Alternatives Initially Considered but Rejected from Further Consideration.

3) The proposed mitigation measure (Table 7.A, 4.12.1) for traffic and parking, specifically parking, is ludicrous. Requiring an Event Traffic Management Plan when expected attendance at larger events exceeds 450 spectators is insane. There are over 1,000 parking spaces in the two lots flanking the project, with at least 1,250 permanent seats planned. The former Belmont Plaza (with about 2,000 seats or more) routinely had over 450 spectators with NO requirement for a traffic management plan. I have attended and participated in numerous events at Belmont Plaza since it opened in 1968 (including being the person who reset the automatic timing equipment before each event at the 1968 Men's Olympic Trials), and have been the meet director for a number of large swim meets. In my experience those events never filled the parking lots, nor were there traffic issues. The cynical me says that such a requirement is simply a means for the City to charge additional fees to event organizers.

Thank your consideration of my concerns.

Lucy

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## **LUCY JOHNSON**

**LETTER CODE: I-22**

**DATE: June 13, 2016**

### **RESPONSE I-22-1**

This comment thanks the City of Long Beach (City) for confirming receipt of the commenter's previous comments on the Draft Environmental Impact Report (EIR) and indicates that this comment letter is intended to summarize the commenter's previous comments on the Draft EIR.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. No further response is necessary.

### **RESPONSE I-22-2**

This comment requests that the proposed Project include 1,500 permanent seats rather than the 1,250 seats currently included as part of the Project. The commenter opines that 1,500 permanent seats are necessary to serve large events to be held at the Project site.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

### **RESPONSE I-22-3**

This comment recommends that the City remove Alternatives 2 through 5 from further consideration as they do not meet the Project Objectives nor are they consistent with the City Council's previous votes on the Project. The commenter suggests that for these reasons, Alternatives 2 through 5 be moved to Subsection 5.2, Alternatives Initially Considered but Rejected from Further Consideration, in Chapter 5.0, Alternatives, of the Draft EIR.

The *State California Environmental Quality Act (CEQA) Guidelines* require that an EIR analyze potential project alternatives that could accomplish most of the basic project objectives and could avoid or substantially reduce significant environmental effects of the project. Alternatives 2 through 5 were considered by the City in its evaluation of reasonable project alternatives. These Alternatives were not included in the "Alternatives Initially Considered but Rejected from Further Consideration" because a more extensive analysis of these alternatives was necessary to ensure the City's due diligence in evaluating whether or not these alternatives would reduce environmental impacts associated with the Project. As discussed throughout Chapter 5.0, Alternatives 2 through 5 were ultimately determined to meet the Project Objectives to a lesser degree than the proposed Project and were determined to only incrementally reduce significant environmental impacts compared to the Project. Therefore, while Chapter 5.0, Alternatives, includes an extensive analysis of these alternatives, these alternatives are not preferred over the proposed Project.

#### **RESPONSE I-22-4**

This comment expresses concern related to Mitigation Measure 4.12.1, which requires the preparation of an Event Traffic Management Plan for special events on the site that would exceed 450 spectators. The comment goes on to describe the fact that there are over 1,000 parking spaces at the two surface parking lots adjacent to the site, and opines that based on personal familiarity with past operations at the site, the Project site and its associated parking areas would be sufficient to accommodate special events at the site that would attract more than 450 spectators. The commenter also notes that special events attracting more than 450 spectators at the former facility were not required to prepare an Event Traffic Management Plan. The comment concludes by asserting that the requirement to prepare such a plan may be a means for the City to charge additional fees to event organizers.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Tuesday, June 14, 2016 9:31 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont Pool

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**From:** Curt Russell [<mailto:curvette@socal.rr.com>]  
**Sent:** Tuesday, June 14, 2016 8:35 AM  
**To:** Craig Chalfant  
**Subject:** Belmont Pool

Dear Mr. Chalfant,

As a long time resident of Long Beach, California, I would like to address the current Belmont Pool project and EIR issues currently on your desk relating to the location of the DIVE WELL and SEATING. I grew up swimming and diving, and this pool has been a beacon for many of us throughout our lives. The legacy of

Importantly, the rebuild of the pool should allow for the appropriate DIVE WELL within the INDOOR facility (not outdoors) AND allow for the appropriate number of SEATS for major national and international aquatic events in DIVING, WATER POLO, and SWIMMING!

I-23-1

As you may know, the facility once held Olympic trials, NCAA championships, and was a place where many youth were inspired to pursue their athletic dreams. It was a place people of all ages enjoyed safe and health recreational activity. Our community is now looking forward to rebuild and continue an important legacy.

To do this the DIVE WELL must be built in the INDOOR facility AND allow for the appropriate number for SEATS for major national and international aquatic events.

I-23-2

It is my understanding that the LB CITY COUNCIL already voted UNANIMOUSLY twice to have an INDOOR DIVE WELL.

An outdoor dive well is unacceptable because of some of the following reasons:

1- SAFETY AND COST - moving it outdoor may cause many problems such as safety of divers due to potential ocean and sun glare and additional significant building costs related to lighting, seating, cleaning, and maintenance.

2-LIMIT ABILITY TO HOST MAJOR EVENTS/LIMITED USE - outdoor placement would potentially limit the seating and limit the new facility's ability to host major events for diving. This undermines the overall best use of the facility.

I-23-3

3-RARE COMMODITY for DIVING COMMUNITY - a diving well, proper boards, and the platform is very important to the diving community. Unlike other aquatic sports which require the pool, diving requires the tower, boards, and the pool so as to practice, train and compete. This is a RARE commodity for Long Beach to have. There are very few facilities in all of Southern California that have the equipment to train all year round and seating for holding competitions. This is essential part of the project to be able to have this type of indoor facility here in Long Beach.

As for SEATING and PARKING - All the aquatic sports need a minimum of 1500 seats to make the use of the facility acceptable. The parking area which already has over 1000 spots must be considered. This new facility has the opportunity to be a phenomenal addition to the United States presence in aquatic athletics. It has a CHANCE to be a FINA (International governing body of diving, water polo, and swimming) regulation aquatic facility in CALIFORNIA and having the seating to accommodate this is very valuable.

I-23-4

This project can once again be a place for recreational activities, training, and once again host competitive events for all aquatic sports from beginner level, to high school, college, national, international, and Olympic levels.

I-23-5

This project is important locally for our town, but also important for Los Angeles County, the State of California, nationally, and internationally.

Thank you for your time and consideration.

Regards,  
Curt Russell

**CURT RUSSELL**

**LETTER CODE: I-23**

**DATE: June 14, 2016**

**RESPONSE I-23-1**

This comment is introductory in nature and notes concerns for the proposed Project related to the location of the dive well and the appropriate seating capacity.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. Refer to Responses I-23-2 regarding the commenter's concerns about the location of the dive well and appropriate seating capacity. No further response is necessary.

**RESPONSE I-23-2**

This comment urges that the dive pool be built indoors and that the Project include an appropriate number of permanent seats for major national and international aquatic events. The comment goes on to express that the Long Beach City Council previously voted for indoor diving facilities on two separate occasions.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

**RESPONSE I-23-3**

This comment provides three reasons that an outdoor dive well is unacceptable with specific reference to safety and cost, limited use and seating, and the rarity of an indoor diving facility.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

**RESPONSE I-23-4**

This comment asserts that a minimum of 1,500 seats are required for the proposed Project. The commenter further notes that the parking area already has over 1,000 parking spaces.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

#### **RESPONSE I-23-5**

This comment expresses the importance of the proposed Project for the local community as well as the aquatic community.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Tuesday, June 14, 2016 9:25 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: the proposed Belmont Pool project

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**From:** David Koch [<mailto:dkoch@HalbertHargrove.com>]

**Sent:** Tuesday, June 14, 2016 8:47 AM  
**To:** Craig Chalfant  
**Subject:** the proposed Belmont Pool project

Hi Craig,

I currently swim at the temporary facility and can't wait to have the new pool for myself and my kids to swim in. I also think it is imperative to revitalizing the pier and waterfront area there. A lot hinges on this being a gathering place for athletes and water-lovers.

I-24-1

I have reviewed the proposed Belmont Pool project report and have some concerns that I would like to address. I think there needs to be at least 1,800 seats for Long Beach to attract events such as the NCAA Div 1 Swimming and Water Polo Championships. The original pool barely fit enough spectators to watch Div 1 CIF water polo championships. Having won 2 CIF titles with Wilson there, I know the home-turf advantage well. NCAA needs a great facility, and this could rival any of the big schools in the area, UCLA, USC, or Pepperdine.

I-24-2

I also want to state that I don't like any of the proposed alternatives. I don't see much in the way of benefits for their additional costs, and I just don't understand the benefits to most of them. Many compromise either the beauty of the structure, the capabilities of the facility, or both.

I-24-3

**David A. Koch, CFP®, CFA, AIF®**  
 Wealth Advisor

HALBERT HARGROVE

111 W. Ocean Blvd., 23rd Floor  
 Long Beach, CA 90802  
**Main** 562.435.5657 x213  
**Toll** 800.435.3505  
**Fax** 562.435.0774  
[www.HalbertHargrove.com](http://www.HalbertHargrove.com)

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**DAVID KOCH**  
**LETTER CODE: I-24**

**DATE: June 14, 2016**

**RESPONSE I-24-1**

This comment expresses support for the proposed Project. The commenter further notes the proposed Project's relevance to the revitalization of the pier and waterfront area.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-24-2**

This comment recommends that the proposed Project should have a minimum seating capacity of 1,800 seats to attract National Collegiate Athletic Association (NCAA) Division 1 Swimming and Water Polo Championships.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-24-3**

This comment expresses opposition to the proposed alternatives identified in the Draft EIR.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Tuesday, June 14, 2016 9:35 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Some issues concerning the rebuilding of the Belmont Plaza Olympic Pool

**From:** [bdman1@aol.com](mailto:bdman1@aol.com) [<mailto:bdman1@aol.com>]  
**Sent:** Tuesday, June 14, 2016 9:27 AM  
**To:** Craig Chalfant  
**Subject:** Fwd: Some issues concerning the rebuilding of the Belmont Plaza Olympic Pool

-----Original Message-----

**From:** bdman1 <[bdman1@aol.com](mailto:bdman1@aol.com)>  
**To:** Craig.chalfont <[Craig.chalfont@longbeach.gov](mailto:Craig.chalfont@longbeach.gov)>  
**Sent:** Tue, Jun 14, 2016 10:20 am  
**Subject:** Some issues concerning the rebuilding of the Belmont Plaza Olympic Pool

Dear Mr. Chalfant,

I wish to offer the following for consideration regarding the new Belmont Plaza Pool project.

I am a former diver and long-time diving coach who's been involved with the sport of diving for more than 50 years. During the late 60s I trained and competed at the first Belmont Plaza Pool, representing the USAF and Phillips 66 Long Beach Swim Club. I competed in the 1968 National AAU Diving Championships that were held at the Belmont Plaza Pool. The facility was a fabulous training and competition venue, one of the best in the world at that time.

1. The first Belmont Plaza Pool had a seating capacity for 2000 spectators. Seating for 1500 in the new facility would be a minimum requirement for a world class venue.

2. While outdoor swim and dive facilities can be wonderful during warm summer months, provided the weather elements remain tolerable, once the days get shorter, issues of light, temperature, wind and other adverse events can seriously reduce utilization of the facility and impact revenue. An indoor facility can provide standard training conditions for most of any day with minimum cost variations and maximum usage. Furthermore, scheduled competition events can be organized far in advance and counted upon.

It is my personal recommendation that if affordability is a major concern, an indoor facility is the ideal choice.

Thank you for your kind attention.

Bill Kanter, Head Diving Coach for Estes Park Schools  
 Estes Park, CO 80517  
 Ph. 970-577-0239  
 E-mail [Bdman1@aol.com](mailto:Bdman1@aol.com)

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**BILL KANTER**  
**LETTER CODE: I-25**

**DATE: June 14, 2016**

**RESPONSE I-25-1**

This comment is introductory in nature and provides background about the commenters' history in aquatics at the former Belmont Pool.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. No further response is necessary.

**RESPONSE I-25-2**

This comment states the former Belmont Pool had a seating capacity for 2,000 spectators and encourages that a minimum of 1,500 seats are included in the proposed Project.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-25-3**

This comment expresses concern related to outdoor swim and dive facilities due to safety concerns associated with changes in seasonal changes in light and temperature. Consequently, the commenter recommends that the City of Long Beach adopt an indoor dive well over an outdoor facility.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Tuesday, June 14, 2016 10:32 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont Pool EIR issues

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**From:** Erica Robinett [<mailto:therobinett6@gmail.com>]  
**Sent:** Monday, June 13, 2016 5:32 PM  
**To:** Craig Chalfant  
**Subject:** Belmont Pool EIR issues

Craig Chalfant  
Senior Planner  
City of Long Beach  
Development Services/Planning Bureau  
333 West Ocean Boulevard, 5th Floor  
Long Beach, California 90802  
Phone: (562) 570-6368  
Email: [craig.chalfant@longbeach.gov](mailto:craig.chalfant@longbeach.gov)

Dear Mr. Chalfant,

As a long time resident of Long Beach, California, I would like to address the current Belmont Pool project and EIR issues currently on your desk relating to the location of the DIVE WELL and SEATING.

Importantly, the rebuild of the pool should allow for the appropriate DIVE WELL within the INDOOR facility (not outdoors) AND allow for the appropriate number of SEATS for major national and international aquatic events in DIVING, WATER POLO, and SWIMMING!

I-26-1

As you may know, the facility once held Olympic trials, NCAA championships, and was a place where many youth were inspired to pursue their athletic dreams. It was a place people of all ages enjoyed safe and health recreational activity. Our community is now looking forward to rebuild and continue an important legacy.

To do this the DIVE WELL must be built in the INDOOR facility AND allow for the appropriate number for SEATS for major national and international aquatic events.

I-26-2

It is my understanding that the LB CITY COUNCIL already voted UNANIMOUSLY twice to have an INDOOR DIVE WELL.

An outdoor dive well is unacceptable because of some of the following reasons:

1- SAFETY AND COST - moving it outdoor may cause many problems such as safety of divers due to potential ocean and sun glare and additional significant building costs related to lighting, seating, cleaning, and maintenance.

I-26-3

2-LIMIT ABILITY TO HOST MAJOR EVENTS/LIMITED USE - outdoor placement would potentially limit the seating and limit the new facility's ability to host major events for diving. This undermines the overall best use of the facility.



3-RARE COMMODITY for DIVING COMMUNITY - a diving well, proper boards, and the platform is very important to the diving community. Unlike other aquatic sports which require the pool, diving requires the tower, boards, and the pool so as to practice, train and compete. This is a RARE commodity for Long Beach to have. There are very few facilities in all of Southern California that have the equipment to train all year round and seating for holding competitions. This is essential part of the project to be able to have this type of indoor facility here in Long Beach.

I-26-3

As for SEATING and PARKING - All the aquatic sports need a minimum of 1500 seats to make the use of the facility acceptable. The parking area which already has over 1000 spots must be considered. This new facility has the opportunity to be a phenomenal addition to the United States presence in aquatic athletics. It has a CHANCE to be a FINA (International governing body of diving, water polo, and swimming) regulation aquatic faculty in CALIFORNIA and having the seating to accommodate this is very valuable.

I-26-4

This project can once again be a place for recreational activities, training, and once again host competitive events for all aquatic sports from beginner level, to high school, college, national, international, and Olympic levels.

I-26-5

This project is important locally for our town, but also important for Los Angeles County, the State of California, nationally, and internationally.

Thank you for your time and consideration.

Yours,  
Erica Robinett  
Long Beach, California

**ERICA ROBINETT**  
**LETTER CODE: I-26**

**DATE: June 13, 2016**

**RESPONSE I-26-1**

This comment is similar to the comments included in Comment I-23. Please see the Response to Comment I-23-1 for a response to this comment.

**RESPONSE I-26-2**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-2 for a response to this comment.

**RESPONSE I-26-3**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-3 for a response to this comment.

**RESPONSE I-26-4**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-4 for a response to this comment.

**RESPONSE I-26-5**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-5 for a response to this comment.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Tuesday, June 14, 2016 10:19 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Response to Draft EIR

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**From:** Charly Collins [<mailto:drno5150@gmail.com>]  
**Sent:** Tuesday, June 14, 2016 10:16 AM  
**To:** Craig Chalfant  
**Subject:** Response to Draft EIR

Dear Mr. Chalfant,

My name is Charles Collins and I am a resident of Long Beach, CA for the past 8 years. However, I've been working with Debby McCormick and McCormick Divers of Long Beach for the last 13 years. I address you in the manner pertaining to the new Belmont Plaza pool and the amenities planned for this historic project.

Before my family moved to California, I knew of Belmont Plaza Olympic Pool. Being the ONLY INDOOR facility in California with the capabilities of hosting Diving, Swimming and Water Polo rivaled the other facilities I've competed at as an athlete and a coach, especially the International Swimming Hall of Fame pool in Ft. Lauderdale, FL. Being able to compete in the pool and then step out onto the sand said a lot for Belmont Plaza and Long Beach itself.

I-27-1

As an athlete and coach for McCormick Divers, I know that Belmont Plaza was in need of much repair to be able to keep up with changing standards for all aquatic sports. We had to pass on many events that wanted to use Belmont diving well and our team to host said events. So it was a double edged sword when Belmont was condemned and demolished for fear of seismic activity with the old building. City Council reassured the aquatic community (and us divers) that a new facility would be constructed to meet all international standards and able to host a slew of events ranging from the local to the international in 2013 by a unanimous declaration.

Making this declaration a reality brings challenges. And as stated in the EIR, these challenges must be met head on:

**Diving well outdoors:** While this will reduce initial cost overall, this will be more costly in the long run. For the athletes, wind and sand will be a major contributing factor in just regular training. Wind brings cooler temperatures, even in warm months. And while wet standing on a 10m high edifice, divers will not be in the best frame of mind to perform difficult dives from that height. Add in the fact that the sport of Diving is a year-round sport and winter training take on a new meaning. Imagine being on Veteran's Pier anytime in November-March in a bathing suit and you get the idea. With moving to the outdoors, diving board and tower placement becomes more problematic. Glare from the ocean and sun WILL need to be considered. Such as putting the direction of the diving boards and tower on a North/South axis to avoid divers looking directly into the sun. Sand gets into EVERYTHING and will eat concrete while salt from the ocean will dine on the metal of the diving boards and tower.

I-27-2

Hooliganism will always be about and is much harder to combat with an outdoor facility. You WILL HAVE people break in and play/break things in the area and use the equipment without a lifeguard. While you can take measures to prevent this (lockable stairs for the tower for instance) it's going to happen. I don't know if the City is willing to take this responsibility.

**Seating and Parking:** All aquatic sports need a minimum of 1500 seats to make the use of the facility acceptable for athletes, their entourage and spectators. Obviously, the more the better. Limiting to only 1250 automatically excludes the new facility to the events it wants to host. Parking to my knowledge has the capacity to have 1000 spots. Along with the "Passport" free service to the new Belmont Pool, parking and traffic can be made acceptable to the neighborhood. I see no problem in increasing to the 1500 recommended seating arrangement in order to bid on all events just under the Olympic Games.

I-27-3

As with any story, a point has to be made. For this story, the new Belmont Plaza can once again be a place for recreational activities, training, and host competitive events for all aquatics sports from the beginner to international. It is important locally for our town, but also important for Los Angeles County, the State of California, and internationally. Thank you for your time and consideration. I hope as a coach of Diving with McCormick Divers, we can bring the world to Long Beach once again with these recommendations.

I-27-4

-Charles Collins  
McCormick Divers  
[www.mccormickdivers.com](http://www.mccormickdivers.com)  
Long Beach Resident (90805)  
M: 310-809-6290

McCormick Divers – Makin’ a Splash Since 1968

Sent from [Mail](#) for Windows 10

**CHARLES COLLINS**  
**LETTER CODE: I-27**

**DATE: June 14, 2016**

**RESPONSE I-27-1**

This comment is introductory in nature and provides background about the commenters' history in aquatics and interest in the proposed Project.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-27-2**

This comment notes challenges associated with an outdoor diving well related to cost, wind and weather conditions, and security and safety.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the Outdoor Diving Well Alternative.

**RESPONSE I-27-3**

This comment suggests that the proposed Project include a minimum of 1,500 seats to make best use of the facility. The commenter further notes that the 1,250 seating capacity of the proposed Project would limit the types of events that can be held at the new facility. The commenter goes on to suggest that the Project-related increase in traffic would be accommodated by the Project site due to the availability of 1,000 parking spaces and the "Passport" transit service serving the Project site. For this reason, the commenter urges that the Project increase the number of permanent seats from 1,250 to 1,500 seats.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-27-4**

This comment expresses the importance of the proposed Project for the local community as well as the aquatic community.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Tuesday, June 14, 2016 10:12 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont Pool

**From:** jerry & Cheryl Jeffery [<mailto:jeryl562@gmail.com>]  
**Sent:** Tuesday, June 14, 2016 10:04 AM  
**To:** Craig Chalfant  
**Subject:** Belmont Pool

6/14/16

Dear Mr. Chalfant,

I am writing to you about some concerns I have on the new Belmont Pool.

First some background, I have lived in Long Beach 74 of my 75 years, moved to Seal Beach one year while at LBSU. My wife and I have lived in Belmont Heights the last 49 years and have raised our 3 children here with the benefit of having the Belmont Pool. | I-28-1

We think the youth of today deserve a pool with all the benefits of the previous pool if not more. At important swim meets and water polo matches seating was at a premium, so don't cut back on the seating, if anything add more seats. The indoor platform and diving well was the only one of its kind in the immediate area. Please, keep it. The city council has voted twice to have it indoors, don't change it. | I-28-2  
| I-28-3

We love Long Beach, let's keep it strong. Don't put in a substandard pool, the people deserve the BEST.

Sincerely,

Jerry and Cheryl Jeffery

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**JERRY AND CHERYL JEFFERY**  
**LETTER CODE: I-28**

**DATE: June 14, 2016**

**RESPONSE I-28-1**

This comment is introductory in nature and provides background about the commenters' residence and interest in the Project.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. No further response is necessary.

**RESPONSE I-28-2**

This comment notes the importance of the proposed Project for local youth who will utilize the Project for swim meets and water polo matches. As such, the commenter suggests that the proposed Project include more permanent seating for spectators attending these meets and matches.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-28-3**

This comment recommends that the proposed Project locate the diving well indoors, as the City Council as unanimously voted to keep this facility indoors on two separate occasions.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Tuesday, June 14, 2016 9:57 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Pool Planning

---

**From:** jerry nulty [<mailto:jnultyvideo@verizon.net>]  
**Sent:** Tuesday, June 14, 2016 9:50 AM  
**To:** Craig Chalfant  
**Subject:** Pool Planning

Craig Chalfant  
Senior Planner  
City of Long Beach  
Development Services/Planning Bureau  
333 West Ocean Boulevard, 5th Floor  
Long Beach, California 90802  
Phone: (562) 570-6368  
Email: [craig.chalfant@longbeach.gov](mailto:craig.chalfant@longbeach.gov)

Dear Mr. Chalfant,

As a long time resident of Long Beach, California, I would like to address the current Belmont Pool project and EIR issues currently on your desk relating to the location of the DIVE WELL and SEATING.

Importantly, the rebuild of the pool should allow for the appropriate DIVE WELL within the INDOOR facility (not outdoors) AND allow for the appropriate number of SEATS for major national and international aquatic events in DIVING, WATER POLO, and SWIMMING!

As you may know, the facility once held Olympic trials, NCAA championships, and was a place where many youth were inspired to pursue their athletic dreams. It was a place people of all ages enjoyed safe and health recreational activity. Our community is now looking forward to rebuild and continue an important legacy.

I-29-1

To do this the DIVE WELL must be built in the INDOOR facility AND allow for the appropriate number for SEATS for major national and international aquatic events.

I-29-2

It is my understanding that the LB CITY COUNCIL already voted UNANIMOUSLY twice to have an INDOOR DIVE WELL.

An outdoor dive well is unacceptable because of some of the following reasons:

1- SAFETY AND COST - moving it outdoor may cause many problems such as safety of divers due to potential ocean and sun glare and additional significant building costs related to lighting, seating, cleaning, and maintenance.

2-LIMIT ABILITY TO HOST MAJOR EVENTS/LIMITED USE - outdoor placement would potentially limit the seating and limit the new facility's ability to host major events for diving. This undermines the overall best use of the facility.

I-29-3

3-RARE COMMODITY for DIVING COMMUNITY - a diving well, proper boards, and the platform is very important to the diving community. Unlike other aquatic sports which require the pool, diving requires the tower, boards, and the pool so as to practice, train and compete. This is a RARE commodity for Long Beach to have. There are very few facilities in all of Southern California that have the equipment to train all year round and seating for holding competitions. This is essential part of the project to be able to have this type of indoor facility here in Long Beach.

As for SEATING and PARKING - All the aquatic sports need a minimum of 1500 seats to make the use of the facility acceptable. The parking area which already has over 1000 spots must be considered. This new facility has the opportunity to be a phenomenal addition to the United States presence in aquatic athletics. It has a CHANCE to be a FINA (International governing body of diving, water polo, and swimming) regulation aquatic faculty in CALIFORNIA and having the seating to accommodate this is very valuable.

I-29-4

This project can once again be a place for recreational activities, training, and once again host competitive events for all aquatic sports from beginner level, to high school, college, national, international, and Olympic levels.

I-29-5

This project is important locally for our town, but also important for Los Angeles County, the State of California, nationally, and internationally.

Thank you for your time and consideration.

Yours,

Jerry Nulty

**JERRY NULTY**  
**LETTER CODE: I-29**

**DATE: June 14, 2016**

**RESPONSE I-29-1**

This comment is similar to the comments included in Comment I-23. Please see the Response to Comment I-23-1 for a response to this comment.

**RESPONSE I-29-2**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-2 for a response to this comment.

**RESPONSE I-29-3**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-3 for a response to this comment.

**RESPONSE I-29-4**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-4 for a response to this comment.

**RESPONSE I-29-5**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-5 for a response to this comment.

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June 9, 2016

Bruce Bradley  
262 St. Joseph Ave.  
Long Beach, CA 90803

Craig Chalfant, Senior Planner City of Long Beach  
Development Services/Planning Bureau  
333 West Ocean Blvd., 5<sup>th</sup> Floor  
Long Beach, CA 90802

Dear Mr. Chalfant:

I would like to address a few items covered in the draft EIR for the new Belmont Plaza pool. On the whole your group is doing a fine job with the design and functionality of the project. Incidentally, I was at the opening ceremonies back in the 1960's and qualified for the 1968 Olympic water polo team after competing in the trials at Belmont Plaza pool. The new plans call for 1250 indoor seats, which is not really enough for major competitions and I'm not talking about those the size of Olympic trials, world competitions or Olympic events. National championships, international competitions and major college or CIF competitions should hold at least 1500 seats for spectators and athletes. The old Belmont had over 2000 seats. Indoor diving towers are essential to the project and must not be eliminated. There are too few facilities in southern California any more, and we have such a great tradition of aquatics greatness to uphold.

I-30-1

I-30-2

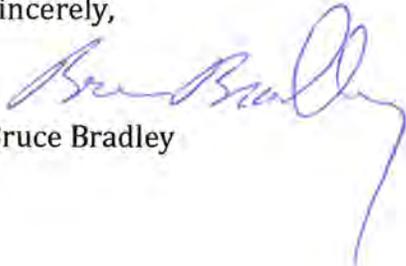
I could not understand why the report includes traffic and parking mitigation in the permitting process for events when there is already ample parking in place on both sides of the proposed structure. It sounds like more bureaucracy to me. We need to remember that function must come before aesthetics on this project, and a truly functional complex will greatly benefit the whole city, if it is built to accommodate more diversified large competitions.

I-30-3

I am writing this letter as a past president of the Long Beach Century Club and a current member of the board of directors of the Aquatics Capital of America organization. Thank you also for listening to the opinions of the greater Long Beach community.

I-30-4

Sincerely,

  
Bruce Bradley

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BRUCE BRADLEY  
**LETTER CODE: I-30**

**DATE: June 9, 2016**

**RESPONSE I-30-1**

This comment provides introductory information about the commenter and notes that the proposed Project should have more than the proposed 1,250 seating capacity in order to accommodate major competitions. The commenter recommends that there should be at least 1,500 seats in the proposed facility.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final Environmental Impact Report (EIR) for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-30-2**

This comment recommends that the indoor diving towers are essential to the proposed Project and should not be eliminated.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

**RESPONSE I-30-3**

This comment questions the need for traffic and parking mitigation and asserts that there is ample parking on both sides of the Project site.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

**RESPONSE I-30-4**

This comment introduces the commenter's role in community and aquatic organizations, and expresses gratitude for consideration of the community's opinions.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. No further response is necessary.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Tuesday, June 14, 2016 1:38 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: DEIR for Belmont Plaza Pool

**From:** Veronica A. Gates [<mailto:rgates6810@aol.com>]  
**Sent:** Tuesday, June 14, 2016 12:39 PM  
**To:** Craig Chalfant  
**Subject:** DEIR for Belmont Plaza Pool

**Mr. Craig Chalfant, Senior Planner**

City of Long Beach  
 Development Services/Planning Bureau  
 333 W. Ocean Boulevard, 5th Floor  
 Long Beach, CA 90802

Re: Belmont Plaza Pool

Dear Mr. Chalfant,

As a resident of the City of Long Beach, as well as a Board Member of Aquatic Capital Foundation, I am writing to summarize some of the valuable concerns I have regarding the design of our city's pool project. I acknowledge the beautiful job of design your group has done for the project, but have some specific concerns for some of the functions of the project. I most definitely would like to see the dive platform incorporated into the inside pool and hope that the outside pool will not be considered due to the many arguments against having it there, which I will not repeat as I know you are aware of them. I would like Long Beach to have an indoor diving complex and be among the three in the western US to claim title to offering this.

I-31-1

I-31-2

Another concern to me is the seating capacity being only 1,250 permanent seats for our swim and dive events. Long Beach cannot attract events such as the NCAA Division 1 swimming and diving championships unless we have a minimum of 1,500 seats. Can we not stretch it to that figure so that our city will not be overlooked for these attractive competitive events?

I-31-3

One of the mitigation measures calls for a "Event Traffic Management Plan" wherein any special event of large proportion would have expensive requirements re the parking lots. In the past, the lots surrounding the old pool complex were never fully utilized and I see this requirement, at the seating capacity our pool events would be operating, to be totally unnecessary.

I-31-3

Hopefully, you and the rest of our city staff will listen to the opinions of our community with regards to our citizens having a world-class facility for the training and competition of our youth. May Long Beach forever be known as the Aquatic Capital once this state-of-the-art facility is built!

I-31-4

Thanking you in advance for your support,

Veronica Gates  
308 Claremont Avenue  
Long Beach 90803

**VERONICA A. GATES**

**LETTER CODE: I-31**

**DATE: June 14, 2016**

**RESPONSE I-31-1**

This comment provides introductory information about the commenter and concerns about the proposed Project.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. No further response is necessary.

**RESPONSE I-31-2**

The commenter expresses preference for an indoor diving well.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

**RESPONSE I-31-3**

This comment expresses concern for the mitigation measure requiring an Event Traffic Management Plan for large events. The commenter expresses the opinion that this mitigation measure would be unnecessary due to the proposed capacity and parking areas that were underutilized during events at the former Belmont Pool.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

**RESPONSE I-31-4**

This comment is conclusory in nature and requests that City of Long Beach staff listens to the opinions of the community about the proposed Project.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Tuesday, June 14, 2016 1:45 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont Pool EIR issues

**From:** Amy Opheim [<mailto:amysnowopheim@gmail.com>]  
**Sent:** Tuesday, June 14, 2016 12:21 PM  
**To:** Craig Chalfant  
**Subject:** Re: Belmont Pool EIR issues

Hello,

As a resident of Long Beach and the parents of a competitive diver, I am writing to you in regards to the location of the dive well and stadium seating in the Belmont Pool plans. If appropriately constructed, this dive well could bring untold traffic to Long Beach year-round, as it did in the previous Olympic year, assuming the dive well and seating are indoors. If properly situated, this new arena has the chance to be a FINA (International governing body of diving, water polo, and swimming) regulation aquatic facility in CALIFORNIA which will draw incredible amounts of traffic. An outdoor dive well is not an acceptable option for major diving events and is also an every day safety hazard for the divers because of the glare from the sand and ocean. Please note that the diving community in Long Beach is requesting an indoor facility with plenty of seating.

I-32-1  
I-32-2  
I-32-3

Thanks for your time,

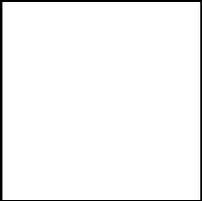
Amy Opheim  
Long Beach, California

Amy Opheim  
C3 Marketing and Copywriting

[amysnowopheim@gmail.com](mailto:amysnowopheim@gmail.com)

[www.c3copywriting.com](http://www.c3copywriting.com)

562.972.1855



**AMY OPHIUM**  
**LETTER CODE: I-32**

**DATE: June 14, 2016**

**RESPONSE I-32-1**

This commenter is introductory in nature and expresses concern related to the location of the dive well and permanent seating provided by the proposed Project. These comments are further emphasized in Comments I-32-2 and I-32-3 and are responded to in Responses I-32-2 and I-32-3, below.

Refer to Common Responses 1 and 2 in Section 2.1, Frequent Comments and Common Responses, of this Final Environmental Impact Report (EIR) for further discussion related to the permanent seating capacity provided by the proposed Project and the Outdoor Dive Well Alternative.

**RESPONSE I-32-2**

This comment expresses concern related to traffic that would be generated as a result of Project implementation, namely implementation of the proposed dive well.

Project-related traffic impacts are addressed further in Section 4.12, Transportation and Traffic, of the Draft EIR. Section 4.12, Transportation and Traffic, in the Draft EIR addresses traffic impacts resulting from the proposed Project. As described throughout this section, as compared to the former facility, the proposed Project could serve twice as many users as the former facility. As such, to analyze traffic impacts resulting from Project implementation, operational traffic was doubled. The results of this analysis indicated that all study area intersections would operate at Level-of-Service (LOS) C or better in the future with new traffic generated by the Project.

An additional analysis of Project traffic generated by special events was conducted as part of the traffic analysis in Section 4.12, Transportation and Traffic, of the Draft EIR. The results of this analysis concluded that with events with more than 400 spectators could result in potential traffic impacts. As such, Mitigation Measure 4.12.1 was identified to reduce potential traffic impacts resulting from special events. Mitigation Measure 4.12.1 would require the preparation of an Event Traffic Management Plan for events with more than 450 spectators. Implementation of this measure was determined to reduce potential impacts associated with special events at the Project site to a less than significant level.

Please also refer Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Project-related traffic impacts and Mitigation Measure 4.12.1.

For the reasons described above, although the Project would result in an increase in traffic as compared to the former pool facility, this increase would be less than significant with mitigation incorporated.

### **RESPONSE I-32-3**

This comment expresses concern about the location of the dive well due to safety concerns related to glare from the sand and ocean. The comment concludes by asserting that the diving community is requesting an indoor diving well.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Tuesday, June 14, 2016 1:42 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Comments/EIR Draft for the Belmont Pool

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**From:** Lisa Conner [<mailto:LisaC@fdw-law.com>]  
**Sent:** Tuesday, June 14, 2016 12:25 PM  
**To:** Craig Chalfant  
**Cc:** [josephponeill@yahoo.com](mailto:josephponeill@yahoo.com)  
**Subject:** Comments/EIR Draft for the Belmont Pool

Dear Mr Chalfant,

I would like to address a few items covered in the draft EIR for the new Belmont Pool project, to include the diving pool. I am a Belmont Shore resident, Long Beach business owner and the proud mother of a young diver who trains and competes with McCormick Divers.

I-33-1

The new plans call for 1250 seats, which is not enough for major competitions. I encourage you to consider minimally 1500 seats for spectators and athletes. The old pool had the capacity to seat 2000.

I-33-2

Please do not consider moving the diving pool outdoors. It is my understanding that the City Council voted unanimously on two separate occasions to have a separate diving well with platforms INDOORS. An outdoor option is unacceptable. Not only would it be more costly to clean and maintain proper pool temperatures, it would require adequate lighting at night, and have a lack of seating. The divers will benefit from an indoor facility, as they will not have to deal with the elements, to include the bright, burning sun, sand from windy days or the occasional rainfall. There are no other indoor platform diving facilities in California. The indoor site being proposed will attract not only the local population of the greater LA area to learn one of the most popular Olympic sports, it will give an opportunity for Long Beach to develop our future Olympic hopefuls and maintain the great tradition of ALL of our aquatic sports in Long Beach. The unique indoor facility was attractive to the Olympics in the past, and will surely play an exciting role in future Olympics, National and International Competitions, not only for diving, but for swimming and water polo as well.

I-33-3

As far as the parking, there are over 1000 parking spaces on either side of the structure. During events, parking moves in waves as the morning competitors finish and the afternoon competitors arrive. There is also ample parking along Ocean Boulevard, near Bay Shore and several parking lots along 2d Street, all within a very short walk of the Belmont Pool project.

I-33-4

Thank you for your consideration.

Kind regards,

Lisa M. Conner  
FLYNN, DELICH & WISE, LLP  
One World Trade Center, Suite 1800  
Long Beach, CA 90831-1800  
Tel: (562) 435-2626  
Direct: (562) 733-2385  
Fax: (562) 437-7555  
Web: [www.fdw-law.com](http://www.fdw-law.com)

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**LISA CONNER**  
**LETTER CODE: I-33**

**DATE: June 14, 2016**

**RESPONSE I-33-1**

This comment is introductory in nature and encourages the inclusion of the diving pool in the proposed Project.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. No further response is necessary.

**RESPONSE I-33-2**

This comment states the 1,250 seating capacity of the proposed Project would not be sufficient for major competitions. The commenter states that the former Belmont Pool had a seating capacity for 2,000 spectators, and as such, encourages that a minimum of 1,500 seats are included in the proposed Project.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-33-3**

This comment objects to the consideration of moving the diving component outdoors. The comment notes that the City Council previously voted on two separate occasions to have an indoor diving well. The commenter describes concerns related to an outdoor diving well related to maintenance, safety, and temperature that would render the outdoor dive well unacceptable and further opines that an indoor dive pool would serve to attract regional and national aquatic events.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

**RESPONSE I-33-4**

This comment states that there over 1,000 parking spaces on either side of the proposed Project and ample parking on nearby streets. The commenter speaks from personal familiarity with the former Belmont Pool facility when asserting that the current parking lots serving the site are sufficient to serve Project-related traffic.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 15, 2016 8:24 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont shore pool

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**From:** [eyephysiciansoflb@gmail.com](mailto:eyephysiciansoflb@gmail.com) [<mailto:eyephysiciansoflb@gmail.com>]  
**Sent:** Tuesday, June 14, 2016 9:14 PM  
**To:** Craig Chalfant  
**Subject:** Belmont shore pool

Dear Mr. Chalfant,

As a long time resident of Seal Beach, California, I would like to address the current Belmont Pool project and EIR issues currently on your desk relating to the location of the DIVE WELL and SEATING.

Importantly, the rebuild of the pool should allow for the appropriate DIVE WELL within the INDOOR facility (not outdoors) AND allow for the appropriate number of SEATS for major national and international aquatic events in DIVING, WATER POLO, and SWIMMING!

As you may know, the facility once held Olympic trials, NCAA championships, and was a place where many youth were inspired to pursue their athletic dreams. It was a place people of all ages enjoyed safe and health recreational activity. Our community is now looking forward to rebuild and continue an important legacy.

To do this the DIVE WELL must be built in the INDOOR facility AND allow for the appropriate number for SEATS for major national and international aquatic events.

It is my understanding that the LB CITY COUNCIL already voted UNANIMOUSLY twice to have an INDOOR DIVE WELL.

An outdoor dive well is unacceptable because of some of the following reasons:

1- SAFETY AND COST - moving it outdoor may cause many problems such as safety of divers due to potential ocean and sun glare and additional significant building costs related to lighting, seating, cleaning, and maintenance.

I-34-1

I-34-2

I-34-3



2-LIMIT ABILITY TO HOST MAJOR EVENTS/LIMITED USE - outdoor placement would potentially limit the seating and limit the new facility's ability to host major events for diving. This undermines the overall best use of the facility.



3-RARE COMMODITY for DIVING COMMUNITY - a diving well, proper boards, and the platform is very important to the diving community. Unlike other aquatic sports which require the pool, diving requires the tower, boards, and the pool so as to practice, train and compete. This is a RARE commodity for Long Beach to have. There are very few facilities in all of Southern California that have the equipment to train all year round and seating for holding competitions. This is essential part of the project to be able to have this type of indoor facility here in Long Beach.

I-34-3

As for SEATING and PARKING - All the aquatic sports need a minimum of 1500 seats to make the use of the facility acceptable. The parking area which already has over 1000 spots must be considered. This new facility has the opportunity to be a phenomenal addition to the United States presence in aquatic athletics. It has a CHANCE to be a FINA (International governing body of diving, water polo, and swimming) regulation aquatic faculty in CALIFORNIA and having the seating to accommodate this is very valuable.

I-34-4

This project can once again be a place for recreational activities, training, and once again host competitive events for all aquatic sports from beginner level, to high school, college, national, international, and Olympic levels.

I-34-5

This project is important locally, but also important for Los Angeles County, the State of California, nationally, and internationally.

Thank you

Best,  
Gina Craig  
[Meuandjrcraig@verizon.net](mailto:Meuandjrcraig@verizon.net)

▪

Sent from my iPhone

**GINA CRAIG**  
**LETTER CODE: I-34**

**DATE: June 14, 2016**

**RESPONSE I-34-1**

This comment is similar to the comments included in Comment I-23. Please see Response to Comment I-23-1 for a response to this comment.

**RESPONSE I-34-2**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-2 for a response to this comment.

**RESPONSE I-34-3**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-3 for a response to this comment.

**RESPONSE I-34-4**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-4 for a response to this comment.

**RESPONSE I-34-5**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-5 for a response to this comment.

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**Alyssa Helper**

**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 15, 2016 8:43 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont pool

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**From:** Joanne Nelson [<mailto:shoejo@gmail.com>]

**Sent:** Tuesday, June 14, 2016 6:41 PM

**To:** Craig Chalfant

**Subject:** Belmont pool

Dear Mr. Chalfant,

As a former long time resident of Long Beach, California, and a current patron, I would like to address the current Belmont Pool project and EIR issues currently on your desk relating to the location of the DIVE WELL and SEATING.

Importantly, the rebuild of the pool should allow for the appropriate DIVE WELL within the INDOOR facility (not outdoors) AND allow for the appropriate number of SEATS for major national and international aquatic events in DIVING, WATER POLO, and SWIMMING!

I-35-1

As you may know, the facility once held Olympic trials, NCAA championships, and was a place where many youth were inspired to pursue their athletic dreams. It was a place people of all ages enjoyed safe and health recreational activity. Our community is now looking forward to rebuild and continue an important legacy.

To do this the DIVE WELL must be built in the INDOOR facility AND allow for the appropriate number for SEATS for major national and international aquatic events.

I-35-2

It is my understanding that the LB CITY COUNCIL already voted UNANIMOUSLY twice to have an INDOOR DIVE WELL.

An outdoor dive well is unacceptable because of some of the following reasons:

1- SAFETY AND COST - moving it outdoor may cause many problems such as safety of divers due to potential ocean and sun glare and additional significant building costs related to lighting, seating, cleaning, and maintenance.

2-LIMIT ABILITY TO HOST MAJOR EVENTS/LIMITED USE - outdoor placement would potentially limit the seating and limit the new facility's ability to host major events for diving. This undermines the overall best use of the facility.

I-35-3

3-RARE COMMODITY for DIVING COMMUNITY - a diving well, proper boards, and the platform is very important to the diving community. Unlike other aquatic sports which require the pool, diving requires the tower, boards, and the pool so as to practice, train and compete. This is a RARE commodity for Long Beach to have. There are very few facilities in all of Southern California that have the equipment to train all year round and seating for holding competitions. This is essential part of the project to be able to have this type of indoor facility here in Long Beach.

As for SEATING and PARKING - All the aquatic sports need a minimum of 1500 seats to make the use of the facility acceptable. The parking area which already has over 1000 spots must be considered. This new facility has the opportunity to be a phenomenal addition to the United States presence in aquatic athletics. It has a CHANCE to be a FINA (International governing body of diving, water polo, and swimming) regulation aquatic faculty in CALIFORNIA and having the seating to accommodate this is very valuable.

I-35-4

This project can once again be a place for recreational activities, training, and once again host competitive events for all aquatic sports from beginner level, to high school, college, national, international, and Olympic levels.

I-35-5

This project is important locally for our town, but also important for Los Angeles County, the State of California, nationally, and internationally.

Thank you for your time and consideration.

Yours,  
Joanne Nelson

Joanne Nelson  
Capelli New York |Lux Division  
V.P. Sales West Coast |Handbags  
Badgley Mischka, Jewel Badgley Mischka  
5252 Bolsa Ave, Huntington Beach Ca 92649  
N.Y. Showroom 320 5th ave, suite 611  
C:714-313-3456  
O:714-934-8808  
E:joanne.Nelson@Capellinewyork.com

**JOANNE NELSON**  
**LETTER CODE: I-35**

**DATE: June 14, 2016**

**RESPONSE I-35-1**

This comment is similar to the comments included in Comment I-23. Please see Response to Comment I-23-1 for a response to this comment.

**RESPONSE I-35-2**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-2 for a response to this comment.

**RESPONSE I-35-3**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-3 for a response to this comment.

**RESPONSE I-35-4**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-4 for a response to this comment.

**RESPONSE I-35-5**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-5 for a response to this comment.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 15, 2016 8:47 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont Pool Rebuild

**From:** kathy magana-gomez [<mailto:kmgspeechpath@gmail.com>]  
**Sent:** Tuesday, June 14, 2016 5:56 PM  
**To:** Craig Chalfant  
**Subject:** Belmont Pool Rebuild

Dear Mr. Chalfant,

As a 15 year resident of Long Beach, California, I would like to address the current Belmont Pool project and EIR issues currently on your desk relating to the location of the DIVE WELL and SEATING.

Importantly, the rebuild of the pool should allow for the appropriate DIVE WELL within the INDOOR facility (not outdoors) AND allow for the appropriate number of SEATS for major national and international aquatic events in DIVING, WATER POLO, and SWIMMING!

I-36-1

As you may know, the facility once held Olympic trials, NCAA championships, and was a place where many youth were inspired to pursue their athletic dreams. It was a place people of all ages enjoyed safe and healthy recreational activity. Our community is now looking forward to rebuild and continue an important legacy.

To do this the DIVE WELL must be built in the INDOOR facility AND allow for the appropriate number for SEATS for major national and international aquatic events.

I-36-2

It is my understanding that the LB CITY COUNCIL already voted UNANIMOUSLY twice to have an INDOOR DIVE WELL.

An outdoor dive well is unacceptable because of some of the following reasons:

I-36-3



1- SAFETY AND COST - moving it outdoor may cause many problems such as safety of divers due to potential ocean and sun glare and additional significant building costs related to lighting, seating, cleaning, and maintenance.

2-LIMIT ABILITY TO HOST MAJOR EVENTS/LIMITED USE - outdoor placement would potentially limit the seating and limit the new facility's ability to host major events for diving. This undermines the overall best use of the facility.

I-36-3

3-RARE COMMODITY for DIVING COMMUNITY - a diving well, proper boards, and the platform is very important to the diving community. Unlike other aquatic sports which require the pool, diving requires the tower, boards, and the pool so as to practice, train and compete. This is a RARE commodity for Long Beach to have. There are very few facilities in all of Southern California that have the equipment to train all year round and seating for holding competitions. This is an essential part of the project to be able to have this type of indoor facility here in Long Beach.

As for SEATING and PARKING - All the aquatic sports need a minimum of 1500 seats to make the use of the facility acceptable. The parking area which already has over 1000 spots must be considered. This new facility has the opportunity to be a phenomenal addition to the United States presence in aquatic athletics. It has a CHANCE to be a FINA (International governing body of diving, water polo, and swimming) regulation aquatic faculty in CALIFORNIA and having the seating to accommodate this is very valuable.

I-36-4

This project can once again be a place for recreational activities, training, and once again host competitive events for all aquatic sports from beginner level, to high school, college, national, international, and Olympic levels.

I-36-5

This project is important locally for our town, but also important for Los Angeles County, the State of California, nationally, and internationally.

Thank you for your time and consideration.

Respectfully,

Kathy Magana-Gomez

Long Beach, California

University Park Estates

**KATHY MAGANA-GOMEZ**  
**LETTER CODE: I-36**

**DATE: June 14, 2016**

**RESPONSE I-36-1**

This comment is similar to the comments included in Comment I-23. Please see Response to Comment I-23-1 for a response to this comment.

**RESPONSE I-36-2**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-2 for a response to this comment.

**RESPONSE I-36-3**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-3 for a response to this comment.

**RESPONSE I-36-4**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-4 for a response to this comment.

**RESPONSE I-36-5**

This comment is identical to the comments included in Comment I-23. Please see Response to Comment I-23-5 for a response to this comment.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 15, 2016 8:29 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: letter

---

**From:** Ricki Milne [<mailto:mrsricki914@gmail.com>]  
**Sent:** Wednesday, June 15, 2016 8:21 AM  
**To:** Craig Chalfant  
**Subject:** Fwd: letter

Dear Mr Chalfant,

Please do not consider moving the diving pool outdoors. The City Council voted unanimously, TWICE to have a separate diving well with platforms INDOORS. An outdoor option is unacceptable. Not only would it be more costly to clean and maintain proper pool temperatures, it would require adequate lighting at night, and have a lack of seating. There are no other indoor platform diving facilities in California. A site like this will attract not only the local population of the greater LA area to learn one of the most popular Olympic sports, it will give an opportunity for Long Beach to develop our future Olympic hopefuls and maintain the great tradition of ALL of our aquatic sports in Long Beach.

I-37-1

As far as the parking, there are over 1000 parking spaces on either side of the structure.

I-37-2

This pool is an opportunity for the City of Long Beach to host many international events, including Olympic Trials and National Diving Championships. Obviously, this will bring attention and tourism to Long Beach.

I-37-3

Sincerely,

Patrick and Ricki Milne

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**PATRICK AND RICKI MILNE**  
**LETTER CODE: I-37**

**DATE: June 15, 2016**

**RESPONSE I-37-1**

This comment requests that the City of Long Beach (City) keep the diving well indoors, as the City Council unanimously approved an indoor diving well with platforms on two separate occasions. The commenter objects to an outdoor diving well due to a lack of adequate lighting at night and a lack of seating. The commenter opines that an indoor diving well will attract large diving events to the City.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final Environmental Impact Report (EIR) for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

**RESPONSE I-37-2**

This comment states that there are over 1,000 parking spaces on either side of the Belmont Pool structure.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

**RESPONSE I-37-3**

This comment asserts that the proposed Project serves as an opportunity for the City to host international aquatic events, which would bring attention and tourism to the City.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 15, 2016 12:30 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: include in Belmont Pool DEIR comments due by June 16, 2016/Bennett Ave entry closure was planned for Belmont Pool project/April 2013 LSA Assoc. Initial Study  
**Attachments:** Belmont Pool Bennett Ave closure April 2013 LSA Associates.pdf

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**From:** SUSAN MILLER [<mailto:mpshogrl@msn.com>]  
**Sent:** Wednesday, June 15, 2016 10:47 AM  
**To:** Craig Chalfant  
**Subject:** include in Belmont Pool DEIR comments due by June 16, 2016/Bennett Ave entry closure was planned for Belmont Pool project/April 2013 LSA Assoc. Initial Study

To: Craig Chalfant

Please include the following concerns/comments about the access to Belmont Pool.

I-38-1

Regards,  
 Susan Miller

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**From:** SUSAN MILLER <[mpshogrl@msn.com](mailto:mpshogrl@msn.com)>  
**Sent:** Tuesday, April 12, 2016 3:39 PM  
**To:** Tom Modica  
**Cc:** Dino D'Emilia; Michael Rotondi  
**Subject:** proof Bennett Ave entry closure was planned for Belmont Pool project/April 2013 LSA Assoc. Initial Study

Hi Tom,

When I spoke with you after the Belmont Pool Design presentation on Saturday, April 9, 2016 at Golden Sails Hotel - I asked why the plans did not show the Bennett Ave entry closed and Granada Ave as the main entrance to the Pool? You said you didn't think that was ever in the plans. It was per the Initial Study April 2013 by LSA Associates, see above PDF. and drawing below. Closure of Bennett Ave was also publicized via a number of news agencies i.e. <http://lbpost.com/news/2000001819-council-scraps-recreational-belmont-pool-plans-in-favor-of-world-class-aquatic-facility>

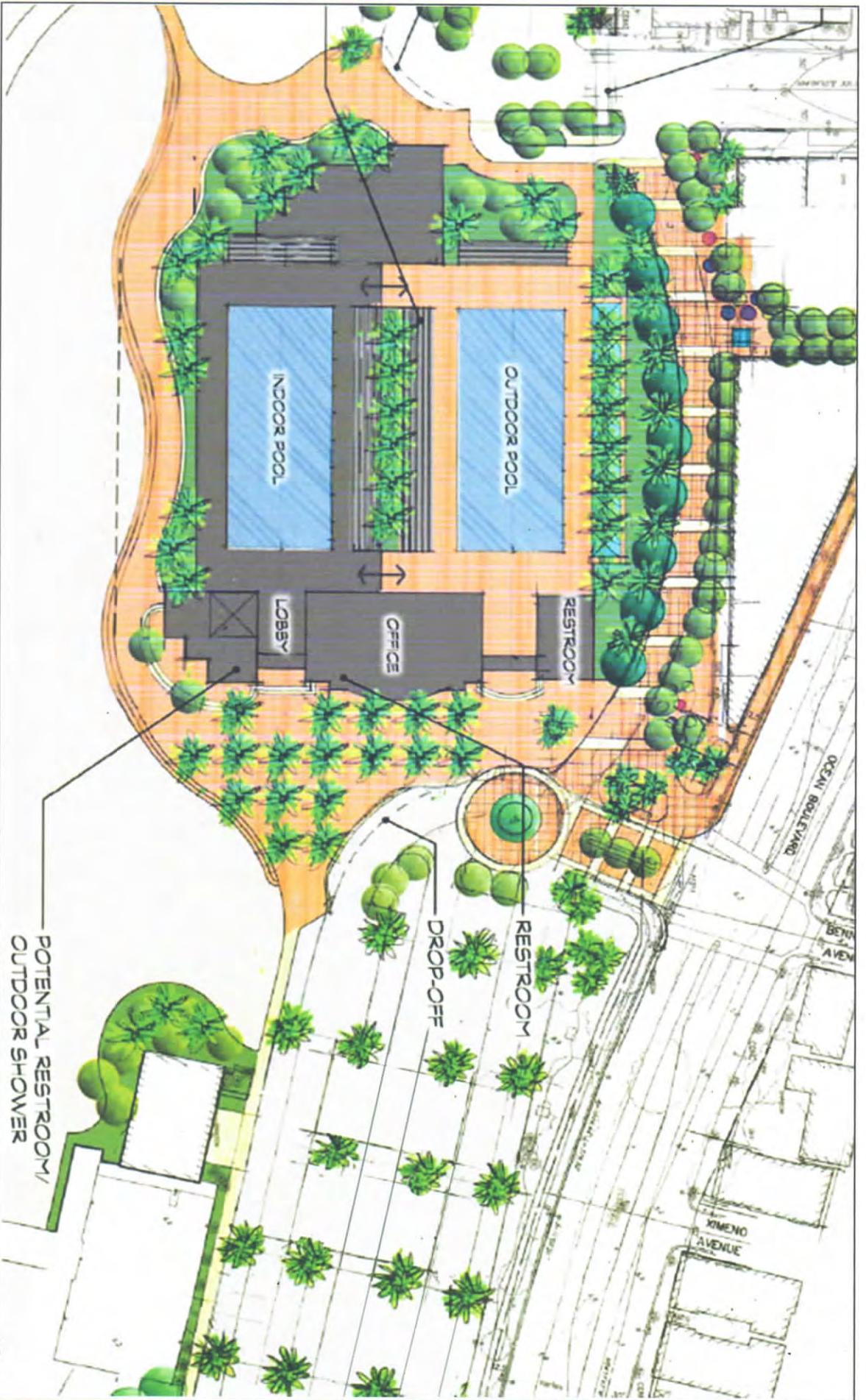
I-38-2

The Initial Study was done in April 2013 by LSA Associates and was on the City webpage. I forget who on City Staff I had talked to about Bennett Ave entry closure. The explanation given to me - For the old Belmont Pool, East Olympic Plaza was the staging/bottleneck/drop off/pick up area for all the swim meet buses plus East Olympic Plaza has street parking. With East Olympic Plaza being completely removed in the new Pool plans, those buses that had previously used East Olympic Plaza for pick up and drop off would shift bus traffic

& cars picking kids up every day for practice out onto East Ocean Blvd. East Olympic Plaza not only was a service and staging street for the old Pool, East Olympic Plaza also has about 60 parking spaces that will be lost with the new plan. ↑ I-38-2

Making Granada Ave the main entrance, forces buses to move off of East Ocean Blvd. for drop off, loading, staging and bottleneck. Buses would enter Granada and loop around inside of the parking lot to drop off and move down the parking lot to a bus holding/staging area. **East Ocean Blvd absolutely can not be bogged down by buses or the evening passenger car rush to pick kids up from practice once East Olympic Plaza is removed for the new Pool.** It is imperative that Granada Ave becomes the new main entrance instead of Bennett Ave to negate traffic back up on East Ocean Blvd. I-38-3





LSA

FIGURE 2



NOT TO SCALE

I:\CLB1302\G\Cncept Site Plan.cdr (4/16/13)

Attachment 1

*Belmont Pool Revitalization Project*  
 Conceptual Site Plan



# INITIAL STUDY

## BELMONT POOL REVITALIZATION PROJECT LONG BEACH, CALIFORNIA

Submitted to:

City of Long Beach  
Development Services/Planning Bureau  
333 West Ocean Blvd., 5<sup>th</sup> Floor  
Long Beach, California 90802

Prepared by:

LSA Associates, Inc.  
20 Executive Park, Suite 200  
Irvine, California 92614  
(949) 553-0666

Project No. CLB1302

LSA

April 2013



Attachment 1

**SUSAN MILLER**  
**LETTER CODE: I-38**

**DATE: June 15, 2016**

**RESPONSE I-38-1**

This comment requests that Comments I-38-2 and I-38-3 be considered by the City of Long Beach (City).

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-38-2**

This comment asks why the site plan does not show Granada Avenue as the main entrance to the pool, as the Initial Study for the proposed Project (April 2013) indicates that Granada Avenue would be the main entrance to the Project site, as do several news agencies (refer to Attachment 1 to this comment letter for an illustration of the site plan for the Project, as included in the Initial Study). The comment goes on to note that the City staff previously informed the commenter that the new Belmont Pool facility would remove the East Olympic Plaza pick up area for buses and as such, and would shift bus traffic and car pick up and drop offs to East Ocean Boulevard. The comment concluded by noting that East Olympic Plaza was not only a service and staging street for the old Belmont Pool facility, but also provided 60 street parking spaces that would be lost under the new plan.

Granada Avenue is located approximately 1,000 feet southeast of the project site. Due to its distance from the site, access to the site was not proposed from this roadway. Bennett Avenue provides access directly to the Project site, and as such, has been proposed as the primary roadway providing vehicular access to the site.

**RESPONSE I-38-3**

This comment asserts that making Granada Avenue the main entrance to the Project site would remove traffic from East Ocean Boulevard, which the commenter opines cannot be bogged down by additional project-related traffic. As such, the commenter asserts that it is imperative that Granada Avenue becomes the new main entrance to the site instead of Bennett Avenue.

Refer to Response I-38-2. Due to the distance of Granada Avenue to the Project site, this roadway was not considered as a main entrance point to the Project site.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 15, 2016 12:34 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Amy Bodek; Linda Tatum; Tom Modica; Dino D'Emilia  
**Subject:** FW: Belmont Pool DEIR comments due by June 16, 2016/Sea Level Rise graphic

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**From:** SUSAN MILLER [<mailto:mpshogrl@msn.com>]  
**Sent:** Wednesday, June 15, 2016 11:10 AM  
**To:** Craig Chalfant  
**Subject:** Belmont Pool DEIR comments due by June 16, 2016/Sea Level Rise graphic

TO: Craig Chalfant  
 Subject: Include following comments for the DEIR on the Belmont Pool

Per SLR graph on [http://www2.pacinst.org/reports/sea\\_level\\_rise/hazmaps/Long\\_Beach.pdf](http://www2.pacinst.org/reports/sea_level_rise/hazmaps/Long_Beach.pdf)  
 I'm concerned the proposed Belmont Aquatic Pool structure building if located in Belmont Shore will cause flooding and be detrimental to the surrounding residents and property owners. Each one of the following changes will compound flooding to happen in the neighborhood:

1. Massive concrete coverage eliminating porous ground.
2. Increased water run off from the high grade of the structure to meet Sea Level Rise requirements.
3. Removal of East Olympic Plaza
4. Removal of the park with mature trees that is a natural water absorption will cause flooding to nearby properties.
5. Additional concrete sidewalks/concrete ADA ramps directing more water flow into the neighborhood.

The 100 year flood line tends to get higher and higher as more and more development occurs causing more run-off and less natural water absorption. The proposed Belmont Aquatic facility will change the grade, water absorption and floodplain of the neighborhood.

Regards,  
 Susan Miller

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**SUSAN MILLER**  
**LETTER CODE: I-39**

**DATE: June 15, 2016**

### **RESPONSE I-39-1**

This comment expresses concern that the proposed Project would cause flooding and be detrimental to the surrounding residents and property. The comment also indicates that the following changes would compound flooding in the neighborhood: concrete coverage eliminating porous ground, increased water runoff from the high grade area of the site, removal of East Olympic Plaza, removal of the park with mature trees which would cause flooding on nearby properties, and the flooding of adjacent sidewalks and ramps thereby directing water flow into the neighborhood. The comment concludes by asserting that the 100-year flood line gets higher as more development occurs causing more runoff and less water absorption, which would be further exacerbated by the proposed Project.

Impacts associated with the potential for on-site flooding are addressed in Section 4.8, Hydrology and Water Quality, of the Draft Environmental Impact Report (EIR). According to the Federal Emergency Management Act (FEMA) Federal Insurance Rate Map No. 06037C1970F, the eastern portion of the Project site is located within Zone A, Special Flood Hazard Area subject to inundation by the 1-percent annual chance flood (see Figure 4.8.3 in this section of the Draft EIR). The western half of the Project site is located within Zone X, areas determined to be outside the 0.2-percent chance (500-year) floodplain.

The proposed Project would not cause or contribute to flooding as a result of rising levels. The potential for sea level rise to result in on-site flooding is addressed in Section 4.6, Global Climate Change, of the Draft EIR. As described further on Pages 4.6-24 and 4.6-25 of Section 4.6, rising sea levels may result in potential on-site flooding in future horizon years (2060 and 2100). However, the main pool deck would be situated 8.8 feet (ft) and 6.6 ft above the projected high water levels in 2060 and 2100, respectively. The lower level of the building (pool equipment and storage) and associated parking areas would be below the projected water line under both scenarios; however, these areas would not be open for public use, and therefore, would not subject visitors to the Project site to significant cumulative impacts related to sea level rise. These projected water elevations also do not account for any shoreline protective devices that may further reduce potential on-site flooding in future horizon years. Furthermore, additional greenhouse gas (GHG) reduction strategies implemented at the State, national, and international levels could reduce sea-level rise between now and the year 2100. Therefore, the proposed Project would not be adversely impacted by flooding associated with sea level rise due to climate change.

As described on Page 4.8-34 of the Draft EIR, FEMA requires that all projects within Zone A not increase the base flood elevation of a 100-year floodplain more than 1 ft. During the subsequent engineering and design phase of the proposed Project, detailed analysis would be conducted to ensure that the design specifically addresses floodplain issues. In addition, implementation of Mitigation Measure 4.8.5 would require a floodplain report to be prepared in order to reduce impacts to the floodplain. Compliance with the City of Long Beach (City) and FEMA regulations and implementation of Mitigation Measure 4.8.5 would ensure that the

proposed Project would not expose people or structures to the risk of flooding, create floodplains, or result in an increase in the base flood elevation. Therefore, impacts associated with flood hazard areas would be less than significant (page 4.8-34).

The proposed Project would decrease the overall impervious area by 0.5 acre and increase the pervious area by 0.5 acre, resulting in an increase in filtration. The proposed Project would also include a comprehensive drainage system to convey on-site flows, including on-site detention and infiltration Best Management Practices (BMPs). While the proposed Project would change on-site drainage patterns by adding impervious surface areas and structures, the proposed Project would be required to prepare a detailed hydrology report to ensure that on-site drainage facilities to be included as part of the Project are appropriately sized to prevent on- or off-site flooding (refer to Mitigation Measure 4.8.4) (page 4.8-32). Therefore, the proposed Project would not contribute to an increase in flooding.

**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 15, 2016 12:36 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Amy Bodek; Tom Modica; Linda Tatum; Christopher Koontz; Dino D'Emilia  
**Subject:** FW: Belmont Pool DEIR comments/current views lines obstruction/Pool design/concession stand location

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**From:** SUSAN MILLER [<mailto:mpshogrl@msn.com>]  
**Sent:** Wednesday, June 15, 2016 11:22 AM  
**To:** Craig Chalfant  
**Subject:** Belmont Pool DEIR comments/current views lines obstruction/Pool design/concession stand location

The Pool plans height of 71' plus 7' plinth makes an overall height of 78' in an area that has a height restriction not to exceed 3 stories or 30'- 36'. Making a height exemption for 78' is not acceptable for a residential neighborhood. That height is out of character for the neighborhood as deemed by the City Land Use Plan. That height obstructs the flight patterns of the protected birds in the habitat trees. Plus the extended curve roof line of the concession stand obstructs current sight lines - that is not an option.

I-40-1

Remove/Lower restaurant curved roof line. Make roof line design something that could be added onto at a later date to make an enclosed dining/seating space on the ocean. Relocate restaurant entry door to side facing Ocean Blvd. so it won't catch the wind. Don't have entry door facing the ocean/sand or to the west.

I-40-2



Regards,  
Susan Miller

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**SUSAN MILLER**

**LETTER CODE: I-40**

**DATE: June 15, 2016**

### **RESPONSE I-40-1**

This comment asserts that the proposed Project would have an overall height of 78 feet (ft) in an area that has a height restriction of 3 stories, or 30 to 36 ft. The commenter asserts that a height variance for the Project is not acceptable for a residential neighborhood because the proposed height of the structure would be inconsistent with the character of the surrounding neighborhood. The commenter also asserts that the height would obstruct flight patterns of the projected birds in the on-site trees and that the roof line of the proposed concession stand would obstruct current views.

In total, the proposed Project would be 19 ft greater in height than the former Belmont Pool complex, which was developed to be 59 ft in height. However, due to rectangular shape and alignment lengthwise from east to west on the southern boundary of the site, the former Belmont Pool facility obstructed coastal views to a greater extent than the proposed Project. Figure 4.1.4, Pre- and Post-Project Building Orientation, illustrates the extent to which the proposed Project would increase coastal views as compared to the former facility. Figures 4.1.5 and 4.1.6, Post-Project Key Views, also demonstrate how the curved elliptical shape of the Bubble would reduce view obstructions of the coast despite the proposed facility being 19 ft greater in height than the former Belmont Pool facility. For these reasons, the proposed Project would not be inconsistent with the visual character of the surrounding neighborhood.

Impacts to biological resources, including on-site birds, were analyzed in Section 4.3, Biological Resources, of the Draft Environmental Impact Report (EIR). Bird species present on the Project site and within the Project area were accustomed to the former Belmont Pool facility and are anticipated to be able to adjust their flight patterns to the new facilities to be constructed as part of the proposed Project, including those that would be increased in height as compared to the former facility.

### **RESPONSE I-40-2**

This comment argues in favor of removing the curved roof line associated with the concession stand and suggests making the roof design into something that could be added on at a later date to allow for an enclosed dining/seating space near the ocean. The comment also suggests relocating the entry to the concession stand to the side facing Ocean Boulevard so it would not be subject to prevailing winds.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 15, 2016 12:37 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Amy Bodek; Tom Modica; Linda Tatum; Christopher Koontz; Dino D'Emilia  
**Subject:** FW: Comments on Belmont Pool DER/due June 16, 2016

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**From:** SUSAN MILLER [<mailto:mpshogrl@msn.com>]  
**Sent:** Wednesday, June 15, 2016 11:39 AM  
**To:** Craig Chalfant  
**Subject:** Comments on Belmont Pool DER/due June 16, 2016

Comments on the Belmont Pool DEIR/Alternatives:

NO PROJECT should be the option. Monies to fully fund the project are not available. With California in a severe drought, any project requiring such massive amounts of water to fill and maintain multiple pools is unfathomable/not environmental conscious. | I-41-1

If funds are accumulated to fully fund a Pool project and California is out of a drought - Harry Bridges Park or convention center parking lot are viable location options: those locations have less Sea Level Rise issues [http://www2.pacinst.org/reports/sea\\_level\\_rise/hazmaps/Long\\_Beach.pdf](http://www2.pacinst.org/reports/sea_level_rise/hazmaps/Long_Beach.pdf), less liquefaction issues, have more infrastructure potential, do not have the same building height restrictions, do not negatively impact a protected bird habitat. Those two locations were not fully vetted. | I-41-2

Measures calling for an "Event Traffic Management Plan" anytime a special event expects more than 450 spectators absolutely must be required for any location especially in Belmont Shore. | I-41-3

Regards,  
Susan Miller

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**SUSAN MILLER**  
**LETTER CODE: I-41**

**DATE: June 15, 2016**

#### **RESPONSE I-41-1**

This comment expresses support for the No Project Alternative because there are insufficient funds to construct the proposed Project and because the proposed Project would demand “mass amounts of water” to maintain the proposed pool facilities.

Project-related increases in demand for water are addressed in Section 4.13, Utilities, of the Draft Environmental Impact Report (EIR). The proposed Project is anticipated to result in a water demand of 38.23 acre feet/year (af/yr), which represents an increase of 18.62 af/yr over existing conditions. This increase in water demand associated with the proposed Project would fall within the available and projected water supplies outlined in the City of Long Beach’s (City) adopted Urban Water Management Plan (UWMP). In addition, the proposed Project would comply with California State law regarding water conservation, including pertinent provisions of Title 24 of the California Government Code (Title 24) regarding the use of water-efficient appliances. The proposed Project would also include the following additional water conservation features:

- Low-flow irrigation system with drip irrigation for shrub areas (90 percent efficiency)
- Rain sensors in conjunction with the automatic irrigation system
- Installation of mulch and/or soil amendments to help retain moisture
- Pool blankets
- Water-efficient plumbing fixtures
- Drought-tolerant landscaping

Therefore, operation of the proposed Project would result in less than significant impacts with respect to water demand, and no mitigation is required.

#### **RESPONSE I-41-2**

This comment supports moving the proposed Project to an alternative project site at Harry Bridges Memorial Park or the “Elephant Lot” at the Long Beach Convention Center, as these locations have less issues related to sea level rise (SLR), infrastructure improvements, height restricts, and biological species (e.g., bird habitat). As such, the commenter opines that these alternative project sites were not fully vetted as viable alternative sites on which to locate the proposed Project.

As discussed in Chapter 5.0, Alternatives, of the Draft EIR, the Harry Bridges Memorial Park and the Elephant Lot site were considered as alternative project sites, but were ultimately rejected from further consideration.

The Harry Bridges Memorial Park was ultimately rejected from further consideration because this site cannot legally be converted to uses other than public outdoor recreation uses under Section 6(f)(3) of the Land and Water Conservation Fund Act and because locating the Project on this site would fail to meet the majority of the Project Objectives.

The Elephant Lot was also rejected from further consideration for the following reasons: the site is under a current lease to the Jehovah's Witnesses organization to accommodate parking demands during the annual convention at the Long Beach Convention Center and the loss of parking spaces on this site would result in additional parking mitigation, development of the Project on this site would not represent the highest and best land use for the area adjacent to the Convention Center, and because development of the Project on this site would fail to meet the majority of the Project Objectives.

For the reasons outlined above, the Harry Bridges Memorial Park and the Elephant Lot would not be reasonable or feasible sites on which to locate the proposed Project.

### **RESPONSE I-41-3**

This comment expresses concern related to the requirement that an Event Traffic Management Plan be prepared for special events with more than 450 spectators.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 15, 2016 1:05 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: belmont pool EIR comments

-----Original Message-----

From: Jeff Miller [<mailto:Jeff.Miller@csulb.edu>]  
Sent: Wednesday, June 15, 2016 12:23 PM  
To: Craig Chalfant  
Subject: belmont pool EIR comments

Please accept this document as my response and comments to the Draft Environmental Impact Report for the City's proposed Belmont Pool Revitalization Project.

I-42-1

Please reply to this message to acknowledge receipt and acceptance of these comments.

The Executive Summary contains a number of inaccurate statements, which I object to. These inaccuracies render the EIR inadequate and must be corrected.

I-42-2

Specifically, I note these inaccuracies with the following six comments:

Comment 1. The Executive Summary, section 1.3 contains this inaccurate statement:

"...implementation of the proposed Project would not result in any significant and unavoidable adverse impacts. All potentially significant impacts have been effectively mitigated to a less than significant level."

There are in fact significant and adverse impacts, which cannot be mitigated, such as:

I-42-3

1. Excessive noise disturbance to residents within at least a ten block radius of the site.
2. Significant increased automobile traffic and congestion in the immediate area which will also impact Second Street, Livingston Drive, Ocean Boulevard, and neighboring residential streets.
3. Significant increased automobile parking congestion in the immediate area which will also impact Ocean Boulevard and neighboring residential streets.
4. Significant loss of ocean views which will negatively impact residents and visitors using the surrounding beach area.

Comment 2. The Executive Summary, section 1.4, states in part:

"...the primary objective of the City, which is to replace the former Belmont Pool facility with a more modern facility that better meets the needs of the local community..."

I-42-4

This is an erroneous statement, because the proposed facility DOES NOT meet the needs of the local community, for the reasons stated above in Paragraph 1.

Comment 3. Table 1.B, Threshold 4.1.1 states:

"The proposed placement and alignment of the Bubble would allow for increased views of the coastline that were previously blocked by the former Belmont Pool structure. Additionally, the curved elliptical shape of

I-42-5

the Bubble reduces the structural scale and mass, when compared to a traditional rectangular building, by eliminating the corners of the building, allowing for an increase in viewable area. Therefore, the change in the building alignment on the site, in combination with the reduced structural mass from the Bubble's elliptical design, would not result in a substantial adverse effect on scenic vistas and a less than significant impact would occur."

I-42-5

This statement is false because the proposed building is eighteen feet higher from the surface and more than double the area of the previous building, which is a significant increase in the OBSTRUCTION of the view, NOT an increase in views.

Comment 4. The statements regarding Threshold 4.1.2 and Threshold 4.1.3 are false because the proposed building is eighteen feet higher from the surface and more than double the area of the previous building, which is a significant increase in the OBSTRUCTION of the view.

I-42-6

Comment 5. Table 1.B, Threshold 4.9.2 states in part:

"Land use compatibility is a combination of other impacts, including potential aesthetic, air quality, noise, and traffic impacts. Potential cumulative impacts associated with traffic generation and related air quality and noise impacts are addressed in those topical sections of this Draft EIR. None of these related environmental topics were found to have significant cumulative effects. Therefore, implementation of the proposed Project would not result in, or contribute to, a cumulatively significant land use impact, and no mitigation is required."

I-42-7

This statement is false, because there ARE significant aesthetic, air quality, noise, and traffic impacts from this proposed project, as stated in the comments above.

Comment 6. Table 1.B, Threshold 4.11.4 states in part:

"Operations associated with the proposed Project are not anticipated to lead to a substantial increase in the number of visitors and vehicles to the Project site."

I-42-8

This statement is false. The City has made numerous claims in its presentations to the public that this project would attract significantly MORE users and visitors than the previous pool accommodated. In fact, this increase is one of the primary reasons that has been given for the design of this project.

Jeff Miller  
PO Box 3310  
Long Beach, CA 90803

**JEFF MILLER**  
**LETTER CODE: I-42**

**DATE: June 15, 2016**

#### **RESPONSE I-42-1**

This comment is introductory in nature and requests that the City of Long Beach (City) acknowledge receipt of the commenter's remarks on the Draft Environmental Impact Report (EIR).

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

#### **RESPONSE I-42-2**

This comment opines that the Executive Summary chapter of the Draft EIR contains several inaccuracies that render the Draft EIR inadequate. These inaccuracies are described and responded to further below in Responses to Comments I-42-3 through I-42-8.

#### **RESPONSE I-42-3**

This comment is in reference to Subsection 1.3 of Chapter 1.0, Executive Summary, of the Draft EIR. The commenter takes issue with the conclusion in this subsection which indicates that the proposed Project would not result in significant and unavoidable impacts and that all potentially impacts associated with the proposed Project would be mitigated to a less than significant level. The commenter goes on to suggest that the following Project-related impacts are significant and adverse: (1) excessive noise disturbance to residents adjacent to the site, (2) significant traffic generation within the Project area, (3) significant parking congestion in the area along Ocean Boulevard and neighborhood, and (4) significant loss of ocean views for residents and visitors in the surrounding area.

As defined by the *State California Environmental Quality Act (CEQA) Guidelines*, a "significant adverse impact" is an impact for which there are no feasible mitigation measures or feasible mitigation measures available would not substantially lessen the adverse effect that the activity may have on the environment. Impacts related to noise, traffic, and aesthetics are addressed in Sections 4.10, Noise; 4.12, Transportation and Traffic; and 4.1, Aesthetics, of the Draft EIR. As described further in these sections, the proposed Project would result in *potentially significant* impacts with respect to noise and traffic (including parking impacts); however, there are feasible mitigation measures to reduce impacts with respect to these topical areas that would reduce such impacts to a *less than significant* level. While there are no potentially significant impacts identified related to aesthetics, view simulations prepared as part of the aesthetics analysis in Section 4.1 of the Draft EIR indicate that the proposed Project would be designed in such as way so as to increase coastal views as compared to the former facility, and would not adversely or significantly impacts the views from public viewpoints. For these reasons, the conclusion in the Draft EIR that impacts with respect to noise, traffic, and

aesthetics would be less than significant with mitigation incorporated or less than significant remains adequate for purposes of accurately disclosing Project-related impacts to these topic areas.

#### **RESPONSE I-42-4**

This comment expresses disagreement with the statement in Subsection 1.4 of Chapter 1.0, Executive Summary, of the Draft Environmental Impact Report (EIR) which indicates that the primary Project Objective is to replace the former Belmont Pool facility with a more modern facility that would better meet the needs of the local community. The commenter asserts that the proposed Project does not meet the needs of the community for the reasons outlined and responded to in Response to Comment I-42-3.

Please refer to Response to Comment I-24-3. The City asserts that replicating a recreational facility that has been present on the site for 46 years and heavily utilized does meet the needs of the local community.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

#### **RESPONSE I-42-5**

This comment expresses disagreement with the conclusion that the proposed Project would increase coastal views due to the curved elliptical shape of the Bubble, which would reduce the structural scale and mass of the building.

Project impacts related to the obstruction of coastal views are addressed in Section 4.1, Aesthetics, of the Draft EIR. As discussed in this section, the assessment of aesthetic impacts is subjective by nature. The City of Long Beach has not adopted defined standards or methodologies for the assessment of aesthetic impacts. As such, view simulations were prepared for the proposed Project to analyze the pre-and post-Project views of the Project site. As illustrated by these figures (Figures 4.1.1 through 4.1.6), although the structure would be taller, the proposed Project would not result in the significant obstruction of coastal views at the edges of the building, and would, in fact, increase coastal views due to the curvilinear design of the proposed facility compared to the former Belmont Pool structure.

#### **RESPONSE I-42-6**

This comment takes issue with the conclusion that the proposed Project would not result in significant and unavoidable impacts related to aesthetics, air quality, noise, and traffic. Please refer to Response I-42-3 for further discussion regarding the significance conclusions made with respect to aesthetics, noise, and traffic topics.

While air quality impacts are not addressed in Response to Comment I-42-3, potential impacts with respect to air quality were analyzed in Section 4.2, Air Quality, of the Draft EIR. This

section of the Draft EIR concludes that project-related air quality emissions would be below applicable thresholds and impacts would be less than significant with adherence to standard conditions.

#### **RESPONSE I-42-7**

This comment disagrees with the conclusion that the proposed Project would not result in cumulatively significant land use impacts and that no mitigation would be required. The commenter asserts that a cumulatively significant impact would occur because there are significant aesthetic, air quality, noise, and traffic impacts.

As described in Responses to Comments I-42-3 and I-42-6, above, while the proposed Project would have potentially significant aesthetic, noise, and traffic impacts, these impacts would be less than significant with implementation of mitigation measures. Impacts related to air quality were determined to be less than significant with adherence to standard conditions. Therefore, these impacts are not considered “significant and adverse” nor are they considered “cumulatively significant.”

#### **RESPONSE I-42-8**

This comment disagrees with the conclusion that the proposed Project would not substantially increase the number of visitors and vehicles to the Project site. The commenter indicates that the need to increase the capacity of the Project is an indication that the Project would substantially increase visitors to the site.

While the proposed Project would increase visitors and vehicles traveling to the site, the Project has been designed to program more events. As such, visitors traveling to the site and events held at the site would be staggered throughout the day, thereby reducing noise generated by the Project. As discussed in Section 4.11, Noise, of the Draft EIR, potentially significant noise would be reduced to a less than significant level with implementation of mitigation. Therefore, because potentially significant noise impacts associated with the Project can be mitigated to a less than significant level, these impacts are not considered “significant and adverse” nor are they considered “cumulatively significant.”

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 15, 2016 1:09 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Good Morning & My Best to You Belmont Pool

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**From:** Gene Simpson [[mailto:simpson\\_gene@yahoo.com](mailto:simpson_gene@yahoo.com)]  
**Sent:** Wednesday, June 15, 2016 10:34 AM  
**To:** Craig Chalfant  
**Subject:** Good Morning & My Best to You Belmont Pool

**Debby McCormick & Belmont Pool**

Long Beach is the 36th-largest city in the United States and the seventh-largest in California with a population of 485,323.

The Belmont was closed due to concerns about an earthquake, it's being replaced by an aquatics complex that city officials and project planners promise will be "iconic."

Belmont Plaza Pool was dedicated on Aug. 15, 1968 for the U.S. Olympic Trials. "The trials were exciting. All of the heroes were there. (Nine-time U.S. Olympic swimming gold medalist) Mark Spitz was there, it wasn't until the 1972 Olympics that Mark had his breakout Olympiad.

"I've seen a lot of pools and the ones for this one look amazing and I think it'll be one of the top aquatic facilities in the United States if not the best," said Wilson High School water polo coach Jeff Nesmith, who won three championships at the pool. "There is a new crop of swimmers and water polo players in Long Beach."

The City Council voted unanimously to authorize the city manager to secure the necessary regulatory approvals for a \$103.1 million preliminary plan for the new pool, which includes indoor seating for 1,250 spectators but that's not enough capacity. The Old Pool had 2,000 seats for their great fans to cheers. ***Please we need more seating for our Aquatic Capital.***

There's a fantastic sign westbound on Westminster. It says "***Long Beach, The Aquatic Capital of the World***".

I've had the pleasure to know Debby McCormick (Lipman) & her husband Glenn the past 40 years

*Glenn McCormick started coaching in 1953. Sadly, he passed away in 1995, leaving behind a trail of National, International and Olympic Champions. His legacy is the McCormick Divers, which he formed in 1968 when the Belmont Plaza Olympic Pool was built for the 1968 Olympic Trials.*

*Glenn was an Olympic and World Games coach and judge. He coached Pat McCormick and Gary Tobian to Olympic gold. Other Olympic medalists and national champions include, Willie Farrell, Ann Cooper culver, Gail Benton, Irenen McDonald of Canada, Patsy Plowman of Australia, Jeanne Stuno, Barb Gilders, Juno Stover Irwin, Paula Jean Meyers, Luis Nino de Rivera and Joaquin Capilla of*

*Mexico, Larry Andreason, Kelly McCormick, Kit Salness, Debby Lipman McCormick, Todd Smith, and Kim Stanfield Berbari.*

I-43-3

*He was US Diving's Ambassador to the world and a rare and caring human being. Glenn was inducted into the Swimming Hall of Fame in 1995. In 1996, US Diving established the Glenn McCormick Award.*

Thank You

Gene Simpson 562- 673-3694  
Enrolled Agent IRS 0011166-EA  
[simpson\\_gene@yahoo.com](mailto:simpson_gene@yahoo.com)

**GENE SIMPSON**  
**LETTER CODE: I-43**

**DATE: June 15, 2016**

**RESPONSE I-43-1**

This comment provides background information about the former Belmont Pool. It is interpreted that the quotes provided by the commenter from the Wilson High School water polo coach are about the proposed facility and offer support for the proposed Project.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-43-2**

This comment notes the financial approvals from the proposed Project, which would have an indoor seating capacity for 1,250 spectators. The commenter further states that the former Belmont Pool had a seating capacity for 2,000 spectators and encourages that more seating is included in the proposed Project.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-43-3**

This comment notes the relevance of aquatics in the City of Long Beach and the former aquatic athletes that coached and trained at the former Belmont Pool.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 15, 2016 1:20 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Comments/EIR Draft for the Belmont Pool

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**From:** Joe O'Neill [<mailto:josephponeill@yahoo.com>]  
**Sent:** Wednesday, June 15, 2016 9:47 AM  
**To:** Craig Chalfant  
**Cc:** Lisa Conner  
**Subject:** Comments/EIR Draft for the Belmont Pool

Dear Mr Chalfant,

My name is Aidan O'Neill. I am 11-years-old and I dive with McCormick Divers. I would be really happy to have an indoor diving facility in Belmont Shore. I think It would be better indoors because it would attract more divers to come, we wouldn't have to worry about weather, and there wouldn't be as much outdoor noise. The pool is really close to my house so it would take a short amount of time to get there. Also, the other divers and I would really be exited to have higher diving boards and finally have platforms. Thank you for taking your time to read my thoughts about the new pool.

Sincerely,

Aidan O'Neill

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**AIDAN O'NEILL**  
**LETTER CODE: I-44**

**DATE: June 15, 2016**

**RESPONSE I-44-1**

This comment expresses support for the proposed Project with specific reference to the indoor diving well component.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 15, 2016 1:21 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Comments/EIR Draft for the Belmont Pool

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**From:** Joe O'Neill [<mailto:josephponeill@yahoo.com>]  
**Sent:** Wednesday, June 15, 2016 9:48 AM  
**To:** Craig Chalfant  
**Cc:** Lisa Conner  
**Subject:** Comments/EIR Draft for the Belmont Pool

Dear Mr Chalfant,

I would like to address a few items covered in the draft EIR for the new Belmont Pool Project, specifically the diving well/pool. I am a Belmont Shore resident, aquatics enthusiast, and the proud father of a young diver who trains and competes with McCormick Divers.

I-45-1

The new plans call for 1250 seats, which is not enough for major competitions. I encourage you to consider minimally 1500 seats for spectators and athletes. The old pool had the capacity to seat 2000.

I-45-2

Please do not consider moving the diving pool outdoors. It is my understanding that the City Council voted unanimously on two separate occasions to have a separate diving well with platforms INDOORS. An outdoor option is unacceptable. Not only would it be more costly to clean and maintain proper pool temperatures, it wouldn't provide adequate lighting at night (a real safety concern), nor would it have requisite seating for spectators and athletes. The divers will benefit from an indoor facility, as they will not have to deal with the elements, to include the bright, burning sun, sand from windy days or the occasional rainfall. There are no other indoor platform diving facilities in California. The indoor site being proposed will attract not only the local population of the greater LA area to learn one of the most popular Olympic sports, but it will also give an opportunity for Long Beach to develop our future Olympic hopefuls and maintain the great tradition of ALL of our aquatic sports in Long Beach. The unique indoor facility was attractive to the Olympics in the past, and will surely play an exciting role in future Olympics, National and International competitions, not only for diving, but for swimming and water polo as well.

I-45-3

As far as the parking, there are over 1000 parking spaces on either side of the structure. During events, parking moves in waves as the morning competitors finish and the afternoon competitors arrive. There is also ample parking along Ocean Boulevard, near Bay Shore and several parking lots along 2nd Street, all within a very short walk of the Belmont Pool project.

I-45-4

Thank you for your consideration.

Sincerely,



**JOSEPH P. O'NEILL**  
**LETTER CODE: I-45**

**DATE: June 15, 2016**

**RESPONSE I-45-1**

This comment is introductory in nature and provides background information about the commenter's interest and association to the proposed Project.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. No further response is necessary.

**RESPONSE I-45-2**

This comment is identical to the comments included in Comment I-33. As such, please see Response to Comment I-33-2 for a response to this comment.

**RESPONSE I-45-3**

This comment is identical to the comments included in Comment I-33. As such, please see Response to Comment I-33-3 for a response to this comment.

**RESPONSE I-45-4**

This comment is identical to the comments included in Comment I-33. As such, please see Response to Comment I-33-4 for a response to this comment.

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From: [mbcotton@hotmail.com](mailto:mbcotton@hotmail.com)  
To: [craig.chalfant@longbeach.gov](mailto:craig.chalfant@longbeach.gov)  
Subject: Belmont Pool EIR Response - Melinda Cotton  
Date: Thu, 16 Jun 2016 14:04:14 -0700

Response to  
"BELMONT POOL REVITALIZATION PROJECT"  
Environmental Impact Report

Submitted by: Melinda Cotton  
PO Box 3310  
Long Beach, CA 90803  
33 year resident of Belmont Shore  
Submitted on June 16, 2016

The EIR erroneously titles the EIR a "Revitalization Project" - which is inaccurate. Revitalize means to: "renovate", "repair", "restore", "renew" according to common definitions. [See: (<http://www.thesaurus.com/browse/revitalize?s=t>)].

However, there is no structure existing to which the word "revitalize" applies. The old Belmont Pool was condemned in 2013 and demolished in December of 2014. The site of the pool itself was graded and is now part of the sandy beach, adjacent to the beautiful passive park covered with grass, established trees (full of birds and nests), walking paths, bike path, and for the last year-and-a-half used by large numbers of the public for picnics, playing with their children, walking dogs, biking and walking through a grassy beachside parkland. (See attached pictures).

I-46-1

It is not a "Revitalization Project" but a totally new construction project.

The City of Long Beach accurately calls the new project the "Belmont Beach & Aquatics Center". It is a totally new design, requiring totally new construction and should be so treated by the EIR.

The location selected by the City is largely based on nostalgia and history and the desires of the aquatics community. However for coastal protection and coastal access, for environmental, land use, aesthetics, noise, traffic, parking, and community considerations and Citywide benefit the new "Belmont Beach & Aquatics Center" could and should be placed elsewhere in the Tidelands, closer to Long Beach neighborhoods that are currently Park Pool and Pool Pool.

I-46-2

The EIR states that there was a "community" desire to build the proposed "..Aquatics center" at the same site. This is not accurate. Other locations were never fully considered or vetted. A 'Stakeholders Committee' of mainly individuals from the Aquatics community focused solely on the former Belmont Pool site, consistently opposing consideration of other sites. While the "Aquatics Center" is to be paid for with City of Long Beach money (Tidelands Funds and other) there was incredibly limited Citywide input, and limited solicitation of input from other than the 3rd Council District (i.e. Southeast Long Beach). It has been pointed out by critics that the proposed "Aquatics Center" on the sand near the Belmont Pier will again be adjacent to the most wealthy segment of the City of Long Beach.

And there are serious questions and no guarantee as to how much of the time the "Aquatics Center" will be open for true public recreation, swimming lessons, etc. as opposed to Aquatics Special Events usage of the

I-46-3

Pool. There is no stated guarantee as to how many days of the year the pools will be available for public recreational use. The City had Cal State Prof. Emeritus Joe Magaddino prepare a report on the Potential Economic Impact of the Pool which was presented to the City Council in October of 2014 (See Staff Report attachment " BBAC 10-21-14 Staff Report-1") The Economic Impact Report discussed up to 135 days a year of Aquatics Special Events- and the public likely would not be able to use the pool during those times.

↑  
I-46-3

Considering that the Pool is being paid for with public money - the public should know exactly how much of the time the Pools will be accessible to the public. With a seating capacity of over 4-thousand spectators - the pools are definitely designed for large public events.

**Traffic & Parking**

Vehicle access to the project area is very limited currently and will be constricted further by the project's design.

I-46-4

While the EIR claims that with the project completed adjacent roads and intersections would nearly always be at an "A" or "B" traffic level, the City's own "Mobility Element of the General Plan" (adopted by the City Council on October 15, 2013, Page 33 "Current Conditions" "Congested Corridors") shows Ocean Blvd. & 2nd Street listed as "Congested Corridors". In the same document "Map 2", page 35 of the "Mobility Element" shows the intersections of Ocean & Redondo and Livingston & 2nd Street with "E" and "F" grades in the AM & PM. The congestion on these streets has gotten worse in recent years with additional Orange County and other commuter traffic, thousands of new residents in downtown Long Beach, etc. The major entry intersection from the East, Pacific Coast Highway & 2nd Street is listed as a "F" level in the PM Peak hours.

I-46-5

And the "Aquatics Center" plans call for the removal of Olympic Plaza Drive, which will eliminate 60 or more parking spaces and eliminate vehicle access from the West, as well as access to businesses on Olympic Plaza Drive. Ocean Blvd. and specifically Bennett Ave. will be the only direct street access to the "Aquatics Center" for drop off, deliveries, disabled access etc. There is no indication the EIR has figured this roadway elimination into its calculations.

I-46-6

And City Traffic Engineering is currently planning to narrow down Ocean Blvd. in this area to one lane in each direction apparently as far as Bay Shore Avenue. The goal is to discourage through traffic on Ocean east of Livingston and to provide more parking for businesses and residents. But this Traffic Engineering goal conflicts with access for more than 4,000 spectators, aquatic participants and staff, and there is no indication the EIR has figured this roadway narrowing into its calculations. Traffic on Ocean Blvd/ Livingston Drive and 2nd Street can be extremely heavy, especially during morning and evening commute hours, and during summer months. Adding 4,000 spectators to this mix is hard to imagine.

I-46-7

**Parking**

The entire area near the proposed "Aquatics Center" is an official City of Long Beach "Parking Impacted" area (see attached map or [\[PDF\]Parking Impacted Area - Development Services www.lbds.info/civica/filebank/blobdload.asp?BlobID=2434](http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=2434))

This is "parking impacted" area because many businesses and apartment buildings have no parking, and so nearby apartments, condos, restaurants and businesses already rely on the beach parking lots for overflow. In addition the new Olympix Health Club will soon open just across from the "Aquatics Center" site. The under-renovation building will be nearly 25,000 sq. ft. with a nearly 4,000 sq. ft. deck. This former 'Yankee Doodles'

I-46-8  
↓

location has no parking of its own and will utilize street and beach parking lots for its hundreds of patrons. ("Grandfathered" lack of parking is regularly granted to businesses in this area to expand and change use, so future increased traffic and parking impacts are expected.) Again, there is no indication the EIR has figured this into its traffic and parking calculations.



Also, the EIR does not factor in a current Belmont Shore Parking Study under the auspices of the City (see attached document Study Map). Street parking is so limited and impacted in Belmont Shore, that the Parking Study consultants have been asked to include in their study the very beach lots noted for the "Aquatics Center". Utilizing the beach lots as a location for 2nd Street business employees and customers to park - with the use of shuttles to get them back and forth - has long been discussed by City officials and others.

I-46-8

The EIR speaks of mitigation for the lack of parking and traffic problems at the Aquatics Center by having the City's Special Events Department workout a plan using shuttles, for example. But as noted above the 'shuttle' approach has never been successfully implemented and there appears to be no acceptable place to park vehicles and shuttle people from.

While the Aquatics Center is supposed to serve all of Long Beach -- it will take two bus rides or a considerable drive plus parking costs for youngsters and adults in North, West or Central Long Beach neighborhoods to get to the East side Long Beach location. It's hard to know how many kids and adults will make that trip.

I-46-9

And with no hotels for miles in any direction, participants and attendees at "Aquatics Center" competitions, etc. will doubtless drive, rather than take buses to events.

**Loss of Park Space**

The loss of the beautiful existing Park Space south of Olympic Plaza Drive between Bennett Drive and the Belmont Pier Parking lot (see photos) is an unacceptable loss. This existing Park Space is natural grass land, with established, beautiful trees. Pedestrian and bike paths cross the park. It is accessible to the public at all hours for walking to the beach, picnics, walks, dog walks, families playing with children, relaxing, even playing musical instruments. The views from this park are beautiful -- views of the ocean, sandy beach, Belmont Pier, sky, etc.

I-46-10

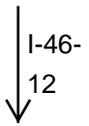
The Aquatics Center EIR claims there will be even more "green space" - stating in effect: "The current passive park "occupies approximately 118,790 square feet (sf)... but would increase to approximately 127,085 sf" however the plans show a significant portion of that added square footage will be occupied by unusable "sloped lawn" - as the new Aquatics Center has to be raised 7 feet (due to expected Sea Level Rise) and the green space has to slope from grade to that 7 foot platform.

The designers state that there will be a 12 foot high, clear plastic/glass fence "surrounding" the Aquatics Center as a security precaution - and that this area (unclear what it consists of) will be closed and locked when not in use by the facility management. How much of the "green space" and "open space" is fenced in and closed much of the time is unclear.

I-46-11

**Aesthetics/Environment**

**The EIR appears to address Aesthetic, environmental and other issues NOT in relation to the existing situation (a level grassy passive park space with many trees and a sandy beach, etc.) - but rather the EIR speaks as though the old Pool was still present and being added onto or renovated in some fashion -- it's**



I-46-12

unclear how the EIR was allowed to be written in this fashion, since the old Pool no longer exists, it was demolished a year and a half ago, there is no structure on the site..

I-46-12

The proposed Aquatics Center will totally block views that now exist from the Park Space (as noted above), the street behind it and nearby businesses and residences. The new 125,500 sq. ft. structure will be 79,905 sq. ft. larger than the former pool and "18 feet taller at the apex", according to Assistant City Manager Tom Modica who has guided the Aquatics Center project for the City. (Please note the EIR on Page 1.2 of the Executive Summary states the new structure will be 11 feet higher than the former pool - the EIR document seems to have ignored the 7 foot tall platform required under the structure due to sea level rise.) Mr. Modica told the City Council on June 14th at a Study Session it would be 18 feet taller.

I-46-13

A final design for the Aquatics Center has not been submitted by the Architect Michael Rotondi, as Rotondi testified at the City Council Study Session June 14th. The Diving Community stated at the Aquatics Center public meeting April 9th that the see through "Bubble" design will allow changing light into the eyes of divers and that will be unsafe and disrupt their performance. Rotondi said June 14th that the estimated \$12 million "diving well" is still being designed (and because the "Aquatics Center" corrected height of 78 feet is due to the "diving well" design, the EIR may not be accurate in this regard).

I-46-14

Chuck's Coffee Shop will lose its current beach view, the under construction Olympix Fitness facility across from the Aquatics Center will lose the "ocean view" it is currently advertising:

[Ocean View in the Making - YouTube](#)



<https://www.youtube.com/watch?v=KTDmxGVXzhg>

Jan 24, 2016 - Uploaded by Olympix Fitness

I-46-15

Passersby on Ocean Blvd., apartments and condos across ocean will all lose their views, all blocked by the 7 foot tall platform and the large "Bubble" structure and facility resting on the platform.

The plastic 'Bubble' structure will also glow with light at least as late as 10 pm each evening, we're told. The Aesthetics of this from the sea and from the land are hard to comprehend, but will likely be distracting from the night sky and likely a disturbance to birds and people nearby.

I-46-16

Keeping the plastic ETFE polymer plastic Bubble clean is an Aesthetic and Environmental concern. We're told that this product has 'non-stick properties' making it "self cleaning" - and that bird droppings, etc. will not be a problem. However dust and dirt definitely will be, as it takes water to remove them, as noted in the technical article "Designing Buildings" dated Oct. 15, 2015 (<http://www.designingbuildings.co.uk/wiki/ETFE>):

"As a fluorocarbon polymer, **ETFE** has similar non-stick properties to PTFE, making it 'self-cleaning'. With a low co-efficient of friction typically of 0.23 (Ref 7), dust or dirt that lands on **ETFE** is washed away by rainwater."

I-46-17

So water (if you don't have rainwater) will be needed to clean the "Bubble" and Long Beach rarely gets rain. This means that the "Bubble" is going to need to be washed frequently -- using lots of water in our drought stricken area and a maintenance problem of large proportions.

The 12 foot tall clear plastic-type fencing surrounding the Aquatics Center will also be difficult to keep clean and free of etching/graffiti/dirt etc. and likely costly to maintain.

I-46-18

**Water and Electricity and Natural Gas usage increase - no mention of use of Solar Power**

The EIR acknowledges that due to the increased size of the pools themselves and the project area that water, electricity and gas usage will increase (the surface area of the pools increases from a previous surface area of 18,410 sq. ft. total to the proposed 36,450 sq.ft and an additional 79,905 sq.ft of building area,

I-46-19

This will definitely impact the City's water supply both by keeping the pools full and water needed for maintenance (noted above)

We see no use of Solar Energy in the project design, a significant negative. The "Bubble" plastic design seemingly makes that impossible.

**Noise**

The EIR acknowledges that "Noise levels generated from the outdoor pool during special events would have the potential to impact nearby noise-sensitive uses because these events would involve a substantial number of spectators, whistles from officiating water polo games, starting horns, and the use of a public address sound system". With the provision for 3,000 outdoor seats for an unknown yearly number of Special Aquatics Events, it's unclear how neighboring residents and businesses will be affected by the noise.

I-46-20

My husband and I live about half a mile from the current "temporary" pool and are disturbed by whistles from officiating water polo games, starting horns, loud spectators and the use of a public address sound system. The City promised mitigation, but it has not occurred. These events sometimes go past 10 pm - so with the unknown number of Special Events and 3,000 person audience capacity - noise from this facility is quite likely going to be a significant factor. In addition, construction and traffic noise will also have neighborhood and community impacts .

**Cost**

While cost is not directly addressed by the EIR - the cost of the Aquatics Center will have a major impact on the City of Long Beach ability to maintain its coastal park and recreation environment and facilities - as well as its Citywide parks and recreation. Two years ago the estimated project cost was set at \$103 million, and that figure has not been updated on the basis of the current design, so we don't have even a ball park figure on the final cost of the Aquatics Center. What we do know is that constructing on an unstable sandy beach is much more expensive than on dry land, and in addition the foundation is required to be 7 feet above the sand to allow for sea level rise. Another expense will be maintenance costs.

I-46-21

We must ask where will that money come from? If it's taken from Tidelands Funds, then where will the money come from to build the needed lifeguard stations, to renovate the aging and dilapidated Belmont Pier, to rebuild the sea walls in Naples and the Sorrento Trail and other coastal needs as well as to maintain existing Tidelands facilities?

I-46-22

If oil revenues do not improve and Tidelands Funds are not available, will money be needed and taken from Citywide Park and Recreation projects? or will grants or special funds be steered to the Aquatics Center, rather than to needed Parks and Recreation projects, especially in the North, West and Central areas?.

As noted, Maintenance Costs of the new complex are a serious concern.

I-46-23

Maintaining the Pool's Plastic 'Bubble' Polymer surface, maintaining the 12 feet of fencing surrounding the pool, are all costly and apparently will come out of the Parks and Recreation budget. The design calls for a moveable pool floor, which we've been told previously is tricky, and requires expensive regular maintenance and adjustment. Moveable bulk heads need maintenance. The cost of water for the pool, heating, electricity, etc. are all costly and apparently will come out of the Parks and Recreation budget.

↑  
I-46-  
23

**Alternatives**

The EIR in its study of "Alternatives" repeatedly refers to the "Project Objectives" (as stated in 5.1.1 of the EIR, see attached). As the "Project Objectives" specifically state in Objective 1: "1. **Redevelop the City-owned site of the former Belmont Pool with similar aquatic recreational purposes**, consistent with the original ballot measure." (bolding added by writer) it's obvious that the EIR consultants were required to find "Alternatives" at other locations unacceptable.

I-46-  
24

[In addition, for example, Objective 13 states: "Locate the pool in an area that serves the existing users." (Since the existing users have been predominantly Southeast Long Beach residents and nearby water polo, swimming and diving participants, again the EIR consultants found other options unacceptable.)

In fact the Belmont Shore site since December 2014 is a clean slate ... consisting of beach sand and an established park with established trees, grass, birds nests, walkways and bikeways.

The new Belmont Beach and Aquatics Center can be located anywhere space allows, and there is such space in the Tidelands areas of downtown Long Beach owned by the City (specifically near the Queen Mary or Convention Center). These downtown Long Beach locations provide sites with almost no Environmental Impacts. The locations would be significantly less expensive to build on, provide a multitude of established public transit options (the Metro Blue Line, bus service from all over the LA County area, etc.) These sites are adjacent to the 710 Freeway and major thoroughfares and parking options. These sites have a multitude of hotel and motel options. They are much easier to reach by one bus trip or by bicycle, etc. by park and pool disadvantaged youth and adults from West, North and Central Long Beach. Construction on these locations would have little or no impact on Coastal resources.

I-46-  
25

The EIR states that the Queen Mary site is unavailable because of a 40-year lease with the City. That 40-year lease was approved by the City on November 17, 2015, 11 months after the Demolition of the former Belmont Pool and during the time the City was planning a new Aquatics Center. City management could have included in the 40-year lease the possibility of using a portion of the property for an Aquatics Center. It apparently purposely closed the door on that Alternative, we don't know why. It still seems the City could find a way to utilize the Queen Mary site if it chose.

I-46-  
26

The Convention Center location is also owned by the City and more than likely could be utilized for the Aquatics Center - if there is City will. The EIR speaks quickly achieving a 'permanent home' for a new Aquatics Center, but the City has a long way to go in raising the unknown sum of money needed to build the facility, and working through the regulatory framework will also take time.

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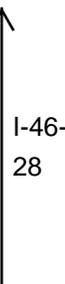
**Recommended Alternative**

I recommend that the City pursue one of the above (or other) Tidelands choices for the location of the new Belmont Beach and Aquatics Center and Alternative 2 as the best choice presented by the EIR (see below). Alternative 2 preserves and protects Coastal Resources and Coastal Access, it protects and preserves the existing Park space (photos attached) and yet retains a sturdy and well-used and sufficient recreational

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pool for the former location of the Belmont Pool. With a permanent foundation, administrative and support facilities added it is an excellent solution for the location and needs of the community.

**"Alternative 2: Maintain Temporary Pool with Ancillary Uses.** This alternative would involve improvements to construct a permanent foundation and permanent administrative and support facilities (lockers, restrooms, snack bar) consistent with the temporary pool configuration. The existing backfilled sand area would be removed and the open space park area would be expanded."



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MELINDA COTTON  
**LETTER CODE: I-46**

**DATE: June 16, 2016**

### **RESPONSE I-46-1**

This comment expresses concern for the use of the word “revitalization” in the title for the proposed Project. The commenter provides background about the demolition of the former Belmont Pool and the existing conditions of the Project site and vicinity. The commenter states that the title of the Environmental Impact Report (EIR) should be revised to the “Belmont Beach & Aquatics Center” to be consistent with the project title used by the City of Long Beach (City). At the outset of the EIR process, the Project was titled “Belmont Pool Revitalization Project” in the Notice of Preparation (NOP) and has retained that name throughout the California Environmental Quality Act (CEQA) process for consistency.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the City decision-makers for their review and consideration. No further response is necessary.

### **RESPONSE I-46-2**

This comment expresses concerns that other locations in the Tidelands were not fully considered as potential sites for the proposed Project. The commenter makes specific reference to considering proximity to Long Beach neighborhoods that are “Park Poor and Pool Poor”. The commenter asserts that it was not a community-wide desire to build the proposed Project on the former Belmont Pool site.

The funding for the proposed Project would originate from Tidelands funds, which are legally mandated to fund development within the City’s Tidelands area. Therefore, developing the proposed Project at alternative location in the City outside of the Tidelands area with Tidelands funds would be expressly prohibited. Due to the cost of the Project, developing the Project outside of the Tidelands area without the Tidelands funds would also be infeasible due to a lack of funding sources. Furthermore, the primary objective of the Project is to replace the former facility in its original location. It should also be noted that the proposed Project was initiated prior to the demolition and removal of the old facility, as it has long been the City’s intention to replace the old facility on the same site.

### **RESPONSE I-46-3**

This comment expresses concern about the number of days the proposed pool facility would be open to the general public. The commenter makes specific reference to an Economic Impact Report presented to the City Council indicating that large aquatic events would use the facility for a number of days throughout the year.

The current Temporary Pool is open to the public seven days a week, year-round. Similar to the Temporary Pool, the proposed Project will be open to the public seven days a week and will

only be closed to observe all scheduled national holidays. Excluding the nine scheduled national holidays, the proposed Project will be open 356 of the 365 calendar days. Therefore, the public would continue to be served at the same level or greater as the previous pool facility.

#### **RESPONSE I-46-4**

This comment notes that vehicular access to the Project area is currently limited and will be further constricted by the Project design.

Project-related traffic impacts are addressed in Chapter 4.12, Transportation and Traffic, of the Draft EIR. As discussed in this section, the project-related increase in vehicles traveling to and from the Project site would result in less than significant impacts at all study area intersections, including the intersections of Termino Avenue/Ocean Boulevard and Bennett Avenue/Ocean Boulevard. Additionally, Mitigation Measure 4.12.1 would require a special event with more than 450 spectators to prepare an Event Traffic Management Plan addressing potential impacts to traffic circulation and the steps necessary to minimize potential impacts (e.g., active traffic management and/or off-site parking and shuttles). Therefore, the proposed Project would not significantly or adversely constrict or congest access to the Project site.

#### **RESPONSE I-46-5**

This comment questions the conclusions in the EIR which indicate that the streets and intersections adjacent to the Project site would operate at an “A” or “B” traffic level. The commenter further states that the EIR conclusions are in direct contrast to the City’s Mobility Element, which includes Ocean Boulevard and 2<sup>nd</sup> Street as designated Congested Corridors. The comment further notes that other intersections near the Project site would operate at “E” and “F” level-of-service (LOS) grades.

Traffic volumes at the study area intersections were collected in February 2016 by an independent data collection company. Observed traffic volumes were analyzed using the adopted methodology (Intersection Capacity Utilization for signalized intersections and Highway Capacity Manual delay for unsignalized intersections). The observed data, when analyzed using the adopted methodology, yielded the results reported in the Draft EIR.

#### **RESPONSE I-46-6**

This comment expresses concern for the removal of Olympic Plaza Drive and asserts that the Draft EIR has included the removal of this access drive into its analysis.

Olympic Plaza between Termino Avenue and 43<sup>rd</sup> Place currently allows on-street parallel parking with a 2-hour limit between the hours of 9:00 a.m. and 6:00 p.m. Parking spaces are not marked, but based on the length of curb available, the number of parking spaces is estimated at 33. Loss of parking or effects on parking are no longer considered impacts under CEQA. The provision of free parking facilitates only the automobile travel mode.

### **RESPONSE I-46-7**

This comment notes that the City of Long Beach Traffic Engineering Department is currently planning to narrow Ocean Boulevard to one lane in each direction as far as Bay Shore Avenue. The commenter asserts that this narrowing of Ocean Boulevard is in conflict with the addition of 4,000 spectators that would be traveling to the Project site. The commenter questions if the traffic narrowing on Ocean Boulevard was included in the analysis in the Draft EIR.

Mitigation Measure 4.12.1 would require a special event with more than 450 spectators to prepare an Event Traffic Management Plan addressing potential impacts to traffic circulation and the steps necessary to minimize potential impacts (e.g., active traffic management and/or off-site parking and shuttles).

### **RESPONSE I-46-8**

This comment states that the area near the Project site is “parking impacted” and asserts that the Draft EIR has considered this in the traffic and parking calculations. The commenter further states that the Draft EIR did not include or reference to the current Belmont Shore Parking Study. This comment concludes by questioning the effectiveness to the proposed event management mitigation measure if patrons cannot find remote parking.

Loss of parking or effects on parking are no longer considered impacts under CEQA and were not included in the EIR. Mitigation Measure 4.12.1 would require a special event with more than 450 spectators to prepare an Event Traffic Management Plan addressing potential impacts to traffic circulation and the steps necessary to minimize potential impacts (e.g., active traffic management and/or off-site parking and shuttles). Parking resources would need to be identified as part of the Event Traffic Management Plan for the application to be deemed complete.

### **RESPONSE I-46-9**

This comment states that the proposed Project would not be readily accessible to residents in the North, West, or Central Long Beach neighborhoods. The commenter further states that the lack of hotels in the vicinity of the Project site would result in vehicle trips rather than travel by public transit to the proposed pool facility.

Section 4.12, Transportation and Traffic, of the Draft EIR, presented a traffic analysis that assumed all trips generated by the proposed Project under routine operation would be vehicle trips. This includes trips generated by competitions with 450 spectators or fewer.

### **RESPONSE I-46-10**

This comment expresses concern for the loss of park space south of Olympic Plaza Drive between Bennett Drive and the Belmont Pier parking lot. The commenter questions how much of the added “green space” would be occupied by unusable “sloped lawn” areas.

As described in Section 4.11, Recreation, of the Draft EIR, the proposed Project would increase the current park and open space areas from 118, 790 square feet (sf) and 45,160 sf to 127,085

and 55,745 sf, respectively. While portions of these areas would contain slopes, these slopes would not be so significant that they would be rendered “unstable” or “unusable.” Furthermore, the passive park and open space areas included as part of the Project are intended to be utilized for general park uses, similar to the existing passive park. Additionally, the first level steps and plinth surrounding the building are available as gathering areas for the public.

#### **RESPONSE I-46-11**

This comment makes specific reference to the clean fencing around the proposed pool facility that would be locked when not in use. This comment inquires how much of the “green space” and “open space” would be included in this fenced area and how much would be open to the public at all times.

The enclosure referenced in the comment is located around the outdoor pool at the top of the stairs on the first level (plinth) to secure the pool facility when closed. No open space or grass areas included as part of the Project would be restricted from use by the public.

#### **RESPONSE I-46-12**

This comment raises concern about the impact analysis related to aesthetics and its comparison to existing conditions versus the prior structure. The commenter states that the analysis should be compared to the conditions after demolition of the former pool complex, rather than be compared to the former pool complex.

As discussed in Section 4.1, Aesthetics, of the Draft EIR, “the inclusion of the former building in the assessment of aesthetic impacts is appropriate because the site has been dedicated as the Belmont Pool Plaza since 1962 when the use of Tidelands funds for the construction of the ‘Belmont Plaza Beach Center’ (now Belmont Plaza) project was approved by the voters after the Long Beach City Council placed the item in the municipal election. Furthermore, the former pool was in use for approximately 45 years and has long been a part of the visual character of the Project area as a recognizable local and regional aquatic facility. Substantial evidence supports the determination that the former Belmont Pool building as the baseline for aesthetics impacts is appropriate because it is based on recent historical use and its presence on the project site” (Page 4.1-17).

#### **RESPONSE I-46-13**

This comment expresses concern that the proposed Project would block views from park space, local businesses, and residences as they exist in current conditions, in consideration of the demolished and vacant former Belmont Pool site. The commenter further notes an inconsistency between the Executive Summary of the Draft EIR and statements made by the Assistant City Manager regarding the height comparison of the proposed Project to the former Belmont Pool.

Project-related impacts with respect to the obstruction or degradation of scenic views are analyzed in Section 4.1, Aesthetics, of the Draft EIR. As discussed in this section, visual impacts are analyzed from public vantage points, as required by CEQA. Views evaluated from

private property are not considered to be protected views under the General Plan polices or Zoning Ordinance. Neither State nor local law protects private views from private lands and the rights of one landowner cannot prevail over the rights of another landowner, except in accordance with uniformly applied standards and policies as expressed in the City's General Plan and Zoning Ordinance. Therefore, views from nearby business or residences were not analyzed in the Draft EIR, unless associated with public viewpoint locations.

The commenter is correct in noting inconsistencies in the height described in the Draft EIR. The height of the proposed facility would be 71 feet (ft) above the plinth, which itself would be located 7 ft above the surrounding grade. As such, the total height of the proposed Project would be 78 ft. This correction has been noted in the Errata and does not change the conclusions or analysis in the Draft EIR as all view simulations correct the height of the proposed facility.

#### **RESPONSE I-46-14**

This comment states that the final design for the proposed Project has not been submitted to the City and expresses concern regarding the light from the proposed bubble structure distracting divers. The comment further notes that the corrected height of the proposed bubble structure may not be reflected in the Draft EIR.

The Ethylene tetrafluoroethylene (ETFE) material that will be used in the Bubble structure diffuses light, including sunlight, and does not allow direct light to shine through. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

The commenter is correct in noting inconsistencies in the height described in the Draft EIR. The height of the proposed facility would be 71 ft above the plinth, which itself would be located 7 ft above the surrounding grade. As such, the total height of the proposed Project would be 78 ft. This correction has been noted in the Errata and does not change the conclusions or analysis in the Draft EIR as all view simulations correct the height of the proposed facility.

#### **RESPONSE I-46-15**

This comment expresses concerns that views from local businesses, residences, pedestrians, and vehicles on Ocean Boulevard would be obstructed by the proposed Bubble structure. This comment includes a link to a YouTube Video. The YouTube video depicts demolition activities associated with the former pool facility and shows ocean views created as a result of the demolition.

Refer to Response I-46-13 for a discussion related to visual impacts and the appropriate baseline conditions.

#### **RESPONSE I-46-16**

This comment states that it is difficult to understand the effects on people and birds from the nighttime glow from the proposed Bubble structure.

Refer to Response I-46-14. The proposed Project would not result in significant adverse impacts with respect to nighttime lighting. The Project architect has indicated that the flow is intended to be equivalent to a full moon. The Project would adhere to all applicable City codes and regulations related to the generation of nighttime lighting to ensure that impacts to people and the natural environment would be less than significant.

#### **RESPONSE I-46-17**

This comment expresses concern about the “self-cleaning” component of the Bubble structure. The commenter includes a link to an article about cleaning dust and dirt from the structure.

It is industry standard for annual inspections to be performed by experienced inspectors. The proposed Ethylene tetrafluoroethylene (ETFE) material is chemically related to “Teflon” and shares many of its properties, such as having a low coefficient of friction and a non-porous surface allowing the natural action of rain to clean its surface. Deposits of dirt, dust, and bird droppings remain unattached to the surface and are washed away by rain. The natural process of wind will remove dust and dirt. In climates where rain is too infrequent to be considered the main cleansing process, a simple cleaning regimen can be implemented that consist of low pressure running water. No use of chemicals or physical wiping of the surface would be required, as debris does not adhere to the surface and the foil does not streak when drying. Fritting of the ETFE will help hid accumulated dirt or dust.

#### **RESPONSE I-46-18**

This comment expresses concern about maintenance and potential vandalism of the 12 ft clear plastic-type fencing surrounding the proposed Project.

The clear fencing is proposed to enhance views to and from the proposed facility. The City does not anticipate that the material would be more difficult to maintain than other wall materials.

#### **RESPONSE I-46-19**

This comment states that the proposed operation and maintenance of the proposed pools would impact the City’s water supply. The commenter opines that the lack of solar energy included in the proposed Project is a significant negative and states that the bubble structure appears to make solar panels impossible.

Project-related impacts related to the project’s increase in water demand are addressed in Section 4.13, Utilities, of the Draft EIR. As discussed on Page 4.13-21 of this section, the projected water demand would be 18.62 acre feet/year, which would represent approximately 0.027 percent of the Long Beach Water Department (LBWD) water supply as projected in the City’s current Urban Water Management Plan (UWMP). Therefore, because the anticipated increase in water demand attributable to the proposed Project would fall within the available and projected water supplies of the 2010 UWMP and because the proposed Project would incorporate additional water conservation features, impacts associated with the long-term operation of the proposed Project would be less than significant, and no mitigation is required

### **RESPONSE I-46-20**

The commenter notes personal experience with noise from outdoor pool activities at the existing temporary pool and states that the City has not provided any mitigation. The commenter further questions about the noise generated by the 3,000 temporary outdoor seats included in the proposed Project and how nearby residences would be affected.

Project-related noise impacts are addressed in Section 4.10, Noise, of the Draft EIR. As discussed in this section, noise levels generated from the outdoor pool under normal operations would be less than 50 A-weighted decibels (dBA) equivalent continuous sound level ( $L_{eq}$ ) (equivalent continuous sound level measured in A-weighted decibels) at the perimeter of the facility. The outdoor pools will be surrounded by a wall that will help mitigate noise off site. In contrast, the existing temporary pool does not have any structures that reduce noise. Noise levels generated from the indoor pool would not impact the closest residences at the Belmont Shore Condominiums, which is approximately 180 ft from the building edge of the proposed Project because the combination of building attenuation and distance attenuation would be 46 dBA. Therefore, noise generated under normal operations and from the indoor pool would not have the potential to impact nearby noise-sensitive uses.

The Noise Section of the Draft EIR also concluded that the proposed Project would result in less than significant impacts with respect to crowd, spectator, and public address system noise with implementation of Mitigation Measure 4.10.1, which requires measures to reduce noise levels from the speakers used at such events. Therefore, noise associated with special events utilizing the full seating capacity at the Project site would be less than significant.

### **RESPONSE I-46-21**

This comment expresses concern for the cost of the proposed Project and potential additional costs associated with Project design. The commenter notes concern for other City of Long Beach park and recreation facilities that require Tidelands funds for operation and maintenance.

Although economic issues are not included in CEQA analysis, impacts resulting from economics can be considered. However, the cost of building and maintaining the pool facility is a policy decision made by the City. In addition, the replacement of the former facility is a recreational benefit to the citizens of Long Beach and meets the desired use for the site as approved by voters in 1962.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

### **RESPONSE I-46-22**

This comment expresses concern for the funding sources and the other projects competing for Tidelands funds.

The Belmont Pool must be funded through Tidelands revenue but will not deplete other budgeted recreational need.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

#### **RESPONSE I-46-23**

This comment expresses more concerns for the maintenance costs of the proposed Project. Specific reference is made to the perimeter fence, the movable pool floor, movable bulkheads, and pool maintenance.

See Responses I-46-21 and I-46-22, above. This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

#### **RESPONSE I-46-24**

This comment questions the inclusion of Project Objective 1 and its impact on the analysis of alternative sites for the proposed Project. The commenter further questions Project Objective 13, which would locate the pool in an area to serve the existing pool patrons. The commenter asserts that the former Belmont Pool site has been vacant since December 2014, presently consisting of beach sand and park areas.

Project Objective 1 aims to redevelop the former Belmont Pool facility with a similar aquatic use. The demolition of the former facility occurred because of seismic and safety issues that made it unsafe for public use. However, the intent of the City for the Project site is to redevelop the site with its historic use as the Belmont Pool aquatic facility, as evidenced by the placement of the temporary pool at the same location. This is a primary objective of the Project.

Project Objective 13 aims to redevelop the Belmont project on the same Project site. While Project Objective 13 aims to redevelop the Belmont project on the site of the former facility, an analysis of alternative project locations was included in Chapter 5.0, Alternatives, of the Draft EIR. As explained on Draft EIR Page 5-8, funding for the proposed Project is entirely sourced from the Tidelands Operating Fund, an umbrella fund that allocates expenditures for Tidelands operations and Capital Improvements projects within the Tidelands area of the City. Tidelands are defined as those lands and water areas along the coast of the Pacific Ocean seaward of the ordinary high tide line to a distance of 3 miles. The Tidelands Trust not only restricts the use of the Tidelands, but also restricts the use of income and revenue generated from businesses and activities conducted on the Tidelands to be used solely for projects within the Tidelands area. Because the proposed Project is dependent on funding from the Tidelands Operating Fund, any alternative location not in the Tidelands would have to be funded through alternative sources. Due to a lack of available finances from other City sources, a project that would not be funded by the Tidelands Operating Fund would not be economically infeasible. Therefore, all three alternative sites were located in the Tidelands. Additionally, according to the City, no other

properties within the City's Tidelands would be large enough or are currently available to be considered as an alternative location. Furthermore, the primary objective of the Project is to replace the former facility in its original location. It should also be noted that the proposed Project was initiated prior to the demolition and removal of the old facility, as it has long been the City's intention to replace the old facility on the same site. Therefore, none of these alternatives were identified as the Environmentally Superior Alternative or the Preferred Alternative. Therefore, this is a primary objective of the Project.

It should be noted that the Project Objectives were developed with careful consideration by the City. The City has decided to retain both Objectives 1 and 13.

#### **RESPONSE I-46-25**

This comment states that the proposed Project could be located in other Tidelands areas of downtown Long Beach owned by the City. The commenter makes specific reference to areas near the Queen Mary and Convention Center. The commenter states that the aforementioned alternative Tidelands sites would have almost no environmental impacts. Furthermore, the commenter makes specific reference to the cost of construction, nearby transit options and freeway access, proximity to hotels, access for disadvantaged youth and adults in City neighborhoods as support for these alternative Tidelands locations. The commenter concludes by stating that construction on these alternative sites would have little to no impact on Coastal resources.

Refer to Response I-46-24 for a discussion as to why alternative locations for the proposed Project were rejected from further consideration or were not considered environmentally superior to the Project.

#### **RESPONSE I-46-26**

This comment states that the 40-year lease on the Queen Mary site was approved after demolition of the former Belmont Pool facility. The commenter states that the City could have included the proposed Project in the lease.

The lease referenced in this comment refers to the lease for the "Elephant Lot" at the Long Beach Convention Center (LBCC), which is a parking lot on the east side of the LBCC that is leased to the Jehovah's Witnesses organization to accommodate parking demands during the annual convention at the LBCC. The lease expires in 2030 and requires 3,000 parking spaces in two different lots, one of which is the Elephant Lot that provides 1,915 of these spaces.

Due to the existing lease, this alternative site is in conflict with Objective 3, which aims to minimize the time the public is without a permanent pool facility. Further, any loss of parking for Jehovah's Witnesses or the LBCC would require additional mitigation. Special events, such as the annual Grand Prix of Long Beach, also use the parking lot for events and staging. This alternative site would not represent the highest and best land use for the area adjacent to the convention center, which should be reserved for convention or hotel uses.

Although the proposed Project would be compatible with the scale and character of the Downtown area, the unique architecture of the proposed facility would compete with the LBCC and aquarium buildings, and, therefore, the proposed facility would no longer stand out as a signature design as it would at the proposed Project site (Objective 6).

In addition to not meeting Objectives 3 and 6, this site would not meet the other project objectives including: implementation of the land use goals of Planned Development PD-2 (regulations specific to the Belmont Pool and Pier) at the former site (Objective 9); provision of views to the ocean from inside the facility (Objective 12); and no direct accessibility for pedestrian and/or bicycle users, and therefore, not serving the existing users (Objective 13). In addition, implementation of the proposed Project on this alternative site would require a Local Coastal Program amendment, which would not be required at the Project site. For the reasons stated above, the “Elephant Lot” site was rejected as a potential alternative site and was not considered further.

#### **RESPONSE I-46-27**

This comment states that the Convention Center is owned by the City and could be utilized for the proposed Project if it is desired by the City. The commenter further notes that implementation for the proposed Project would take time with regard to raising money and working through the regulatory framework.

Refer to Response I-46-26, above.

#### **RESPONSE I-46-28**

This comment offers the commenter’s recommended alternative for the proposed Project. The commenter’s recommended alternative includes consideration of locations discussed in Comments I-46-25 through I-46-27 or other locations in the Tidelands, and the alternative facility configuration included in Alternative 2 (Maintain Temporary Pool with Ancillary Uses) presented in the Draft EIR.

As part of the alternatives analysis for the proposed Project (Chapter 5.0, Alternatives, of the Draft EIR), it was determined that the proposed alternative locations would meet the Project Objectives to a lesser degree than the Project. Therefore, none of these alternatives were identified as the Environmentally Superior Alternative or the Preferred Alternative. Therefore, the City intends to proceed with the design as included under the proposed Project.

Alternative 2 would eliminate the indoor pool facility and convert the temporary pool into a permanent facility. In total, Alternative 2 would reduce the total pool surface area by approximately 49 percent. Therefore, Alternative 2 would not maximize the potential of the site as an aquatic recreational complex. Although Alternative 2 would meet several of the Project Objectives, it would not meet them to the same degree as the proposed Project. In addition, this alternative would not meet any of the Project Objectives related to the provision of a new pool complex that would serve the recreation needs of the general public, as well as the needs of the established aquatic community served by the former Belmont Pool facility. For these reasons,

Alternative 2 was not identified as the Preferred Alternative. Therefore, the City intends to proceed with the design as included under the proposed Project.

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**Alyssa Helper**

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**From:** Ashley Davis  
**Sent:** Wednesday, June 22, 2016 2:22 PM  
**To:** Alyssa Helper; Maryanne Cronin  
**Subject:** FW: Draft EIR Belmont Pool - Parking

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**From:** Ellen Mathis [<mailto:epmathis@verizon.net>]  
**Sent:** Wednesday, June 15, 2016 7:57 PM  
**To:** Craig Chalfant  
**Subject:** Draft EIR Belmont Pool - Parking

Craig,

I feel it is a very big mistake to take away the parking (2hr limit) that is currently on Midway St and not to replace it. I did not count them, but there are between 30 and 40 is my guess. These are also free parking you are taking away. There are several businesses on that street and Ocean Blvd does not provide sufficient parking. The new business going in will generate more need for parking than the previous business that had shorter business hours. There is no offsite parking planned as far as I can see. I have lived and walked in that area since July 1979 and so consider myself somewhat of an expert.

I listen to the City Council meetings and it seems that all the development that is coming up is being given a waiver on the normal parking requirements. This seems to be just another example. This area is well known as a "parking impacted area."

Please leave the street available for parking cars. Thank you.

Ellen P. Mathis  
562-433-6509  
[EPMathis@verizon.net](mailto:EPMathis@verizon.net)

I-47-1

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**ELLEN P. MATHIS**  
**LETTER CODE: I-47**

**DATE: April 26, 2016**

**RESPONSE I-47-1**

This comment expresses concern regarding the removal of parking on Midway Street. The commenter further states that parking is impacted in the Project vicinity under existing conditions.

Midway Street between 39<sup>th</sup> Place and Termino Avenue is signed “No Parking Anytime.” The proposed Project would not alter that parking restriction designation. Olympic Plaza between Termino Avenue and 43<sup>rd</sup> Place currently allows on-street parallel parking with a 2-hour limit between the hours of 9:00 a.m. and 6:00 p.m. Parking spaces are not marked, but based on the length of curb available, the number of parking spaces is estimated at 33. Loss of parking or effects on parking are no longer considered impacts under the California Environmental Quality Act (CEQA). The provision of free parking facilitates only the automobile travel mode.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 22, 2016 2:11 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont Pool Project

**From:** Denise Burrelli [<mailto:dadburrelli@gmail.com>]  
**Sent:** Wednesday, June 15, 2016 10:48 PM  
**To:** Craig Chalfant  
**Subject:** Belmont Pool Project

Dear Mr. Chalfant:

I would like to express some support on a few items being reviewed for the Belmont Pool Project. I am a parent of a former diver, involved in this sport for 14 years. We always enjoyed going to the Dive Meets at Belmont, and one of the main reasons, was the fact that it was an indoor venue. Not having to fight the weather and just enjoying the meets, was always so pleasant. There is nothing like watching a dive meet indoors. Also an important issue for the elderly and disabled. Making it more enjoyable for all, Divers and spectators..

I-48-1

The next issue would be the seating,, when there is a major event, 1250 is very small. Even if you could increase it to at least 1500 or so, would greatly benefit spectator viewing. When people know that an event is being held at a pool with adequate seating, more people attend.

I-48-2

Another benefit, that we always had, when attending is the parking is ideal. Always being able to find a parking place, because there are currently plenty.

I-48-3

These are very important issues, when considering the Pool Project. I look forward to attending future Dive meets at your location, and knowing that the city of Long Beach cares about our future Divers, makes Long Beach a very special community.

I-48-4

Thank You for taking the time to read this.

Denise Burrelli

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**DENISE BURRELLI**  
**LETTER CODE: I-48**

**DATE: June 15, 2016**

**RESPONSE I-48-1**

This comment expresses support for the proposed project.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-48-2**

This comment requests the increase of the proposed seating capacity from 1,250 spectators to 1,500 spectators. The commenter further notes that the proposed Project should be accessible to all, including the elderly and disabled.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-48-3**

This comment state that there is sufficient parking available near the project site.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

**RESPONSE I-48-4**

This comment is conclusory in nature and reiterates that the issues raised by the commenter are important when considering the proposed Project.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 22, 2016 2:05 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Pool Project Belmont

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**From:** denise [<mailto:junkycat@msn.com>]  
**Sent:** Wednesday, June 15, 2016 11:17 PM  
**To:** Craig Chalfant  
**Subject:** RE: Pool Project Belmont

Dear Mr. Chalfant:

After hearing about the Belmont Pool Project I would like to add a few thoughts about a few items being reviewed. My daughter was a local Diver and I always enjoyed going to the Dive Meets at Belmont.

I-49-1

Please reconsider your seating. Increase it to at least 1500 or so, would greatly benefit spectator viewing. Turn out is always better when there is enough seating, knowing that an event is being held at a pool with adequate seating, promotes larger attendance, 1250 is very small, 1500-2000 is giving more people an opportunity to attend.

I-49-2

Parking was never an issue, there is already adequate parking in that area..

I-49-3

Attending a indoor venue, was always a very pleasant experience. I enjoyed the atmosphere of being indoors, focusing on the events and not having the sun beating down on you, or sitting in the rain. Because of being indoors, we never missed a chance to go to Belmont for a meet. When spectators are disabled, and many times grandparents of diver's attended and made it a pleasant time for everyone. Everyone always had fun at Belmont.

I-49-4

I hope that you will reconsider these issues, when considering the Pool Project.

I-49-5

Long Beach is a wonderful community and investing in the future of our children is always a very important issue.

Thank You Long Beach and all involved in this Rebuilding.

Anthony Burrelli

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**ANTHONY BURRELLI**  
**LETTER CODE: I-49**

**DATE: June 15, 2016**

**RESPONSE I-49-1**

This comment is introductory in nature and provides background information about the commenter's interest in the proposed Project.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-49-2**

This comment requests the increase of the proposed seating capacity from 1,250 spectators to 1,500–2,000 spectators.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-49-3**

This comment state that there is sufficient parking available near the Project site.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

**RESPONSE I-49-4**

This comment offers the commenter's experience in attending indoor aquatic events at the former Belmont Pool.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-49-5**

This comment is conclusory in nature and reiterates that the issues raised by the commenter are important when considering the proposed Project.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 22, 2016 2:03 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont Pool Project

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**From:** Nikki Burrelli [<mailto:naburrelli@gmail.com>]  
**Sent:** Wednesday, June 15, 2016 11:59 PM  
**To:** Craig Chalfant  
**Subject:** Belmont Pool Project

Dear Mr. Chalfant:

I would like to express some support on a few items being reviewed for the Belmont Pool Project. I am a former diver and have been involved in this sport for 14 years. I always enjoyed going to the Dive Meets at Belmont, and one of the main reasons, was the fact that it was an indoor venue. Not having to fight the weather was always what made me want to dive at the pool. There is nothing like diving at a meet indoors. Also an important issue for the elderly and disabled. Making it more enjoyable for all spectators like my grandparents who always attended every meet.

I-50-1

The next issue would be the seating, when there is a major event, 1250 is very small. Even if you could increase it to at least 1500 or so, would greatly benefit spectator viewing. When people know that an event is being held at a pool with adequate seating, more people attend.

I-50-2

Another benefit, that we always had, when attending is the parking is ideal. Always being able to find a parking place, because there are currently plenty.

I-50-3

Witt hopes that I will be working with divers in the future, these are very important issues when considering the Pool Project. I look forward to attending future Dive meets at your location, and knowing that the city of Long Beach cares about the future Divers, makes Long Beach a very special community.

I-50-4

Thank You for taking the time to read this.

Nikki Burrelli

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**NIKKI BURRELLI**  
**LETTER CODE: I-50**

**DATE: June 15, 2016**

**RESPONSE I-50-1**

This comment expresses support for the proposed Project and provides background information about the commenter's experience at the former Belmont Pool.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-50-2**

This comment requests the increase of the proposed seating capacity from 1,250 spectators to a minimum of 1,500 spectators.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-50-3**

This comment states that there is sufficient parking available near the Project site.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

**RESPONSE I-50-4**

This comment is conclusory in nature and reiterates that the issues raised by the commenter are important when considering the proposed Project.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 22, 2016 1:59 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: EIR Belmont Pool

**From:** Jessica Pollack (Payne) [<mailto:jessicaintl@gmail.com>]  
**Sent:** Thursday, June 16, 2016 9:53 AM  
**To:** Craig Chalfant  
**Subject:** EIR Belmont Pool

Dear Mr. Chalfont

Thank you for the opportunity to address the Environmental Impact Report for the proposed Belmont pool. While we appreciate the need to show alternatives to the committee, it doesn't appear that the alternatives removing the diving well will reduce and negative environmental impact, but it will make the facility less attractive to the aquatics community and will hurt the project in the long run.

I contend that spending so much money on a structure that doesn't serve the competitive needs of all of the major sports is just a waste. We need the diving tower, deep water for all competitive sports AND enough seating to hold the prestigious events that will bring competitors, their families and their money to spend in Long Beach while they are here to watch these competitions. From everything I have seen about the project over the years, these will not increase the footprint (which might have an environmental impact) but WILL enhance the project as a whole making it a true destination venue for both recreation and serious aquatics competition.

By keeping the dive tower indoors, making the swimming pool deep enough, wide enough and with at least 1500 seats, we can once again hold PAC12, NCAA, CIF competitions along with major swimming, diving, waterpolo and synchronized swimming competitions. These bring with them prestige and tourism money. Without the ability to attract these competitions, it is just a VERY expensive project. Yes, locals will use it, but it will be far too expensive for the lack of long term benefits if we ignore the needs of the competitive aquatics community.

Even if we have Nationals for Swimming Diving and Waterpolo every year along with the collegiate and high school championships, this will still be a local recreational facility the major of the year, with major economic benefits during the competitions.

I urge the committee to carefully consider how much benefit will come from listening to the aquatics community to make Long Beach's Belmont Pool an attraction for many many years.

Thank you,

Jessica Payne

I-51-1

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**JESSICA PAYNE**  
**LETTER CODE: I-51**

**DATE: June 16, 2016**

**RESPONSE I-51-1**

This comment opines that the proposed Outdoor Dive Well Alternative would not reduce environmental impacts, but would decrease the attractiveness of the proposed Project to aquatic events. The commenter argues in favor of the indoor diving well and asserts that with the correct depth and width of the proposed indoor pool and adequate seating capacity, the proposed Project would serve the community's need for a competitive aquatic facility.

The outdoor 50-meter pool is 25 meters wide. This outdoor pool is where large meets, such as National Collegiate Athletic Associations (NCAAs) and World Championships would take place. Therefore, the outdoor pool would serve to meet recommended pool widths for competitive events.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final Environmental Impact Report (EIR) for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 22, 2016 1:03 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: revised comment on Draft EIR for Belmont Pool Revitalization Project  
**Attachments:** kidsin pool .jpg; response to draft eir pool.pdf

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**From:** Christensen George [<mailto:achris259@yahoo.com>]  
**Sent:** Thursday, June 16, 2016 5:43 PM  
**To:** Craig Chalfant  
**Subject:** revised comment on Draft EIR for Belmont Pool Revitalization Project

Mr. Chalfant, I found a typo on my original submission. Instead of "The subtext of 'community' is skewed to mean only 2nd district residents", it should be only 3rd District residents. Since it may be difficult for you to correct this error, I am resubmitting my comments with the correction. Thanks, Anna Christensen

I-52-1

Anna Christensen Comments on the Draft EIR for the Belmont Pool Revitalization Project

The expanding needs of the “community” re access to public swimming facilities are cited as a major factor in the decision to build two Olympic pools with amenities on the former site of the Belmont Plaza Olympic Pool which was razed due to safety concerns. Long Beach has only two other public swimming pools, neither of which is Olympic size. Not included in the Draft EIR for the Belmont Pool Revitalization Project is any consideration of the city’s demographics re population density, racial disparities re drowning, nor equal access to public pools (race/income/transportation). Having failed to construct any public pools in six of its nine city council districts, including District 9 with both high poverty and the city's largest African American population (black youths age 10-14 are 10 times more likely to drown than their caucasian peers); Long Beach now chooses to build a new complex that will more than double the capacity of the demolished facility, located in its whitest, wealthiest, least populated district. The decision to fund the project exclusively with income from oil revenues that must be used in tidelands areas, precludes construction in seven council districts and severely limits available public lands in Districts 2 and 3. In District 2 (more people, less white, less rich), "alternative" sites are being rejected for questionable reasons (can't have two "iconic" buildings next to each other, Jehovah's Witnesses use the public land under consideration for parking once a year). Nor has consideration been given to revising (splitting) the project footprint by building on two sites instead of one. One of the two Olympic pools (the outdoor one) could be built in Harry Bridges Memorial Park, which must be used for outdoor recreation; thereby providing the 2nd District with a much needed facility while also reducing the travel time to a public pool for residents in other underserved districts. A downtown site would be more suitable for large competitions and more profitable as well. Falling oil revenues have reduced available tidelands funds to half of the estimated total cost of the pool expansion, and monies held in reserve for the project include those previously designated for much needed improvements to other public facilities. That the Draft EIR was written and submitted for public review without addressing any of the above concerns is alarming and means that the document is in violation of both CEQA and the California Coastal Act. The planning department, city council, and the general public must consider the inequity and illegality of the project as it now stands with respect to local, state and federal guidelines and in the context of our legacy of discrimination re access to swimming instruction and competition, beaches, and occupancy of oceanside property. In addition, since the chosen site is on the beach, the California Coastal Commission will review it. The current commissioners have expressed great concern for racial and social justice re equal access to the beach. Certainly this includes equal access to public pools in coastal communities where learning to swim is not just

I-52-2



a fun recreational activity, but a life saving skill - one that insures that an increasingly diverse public will survive their dip in the Pacific. As it stands, this project will favor the most entitled at the expense of the most vulnerable, thus privilege becomes prophecy. The project objective to “better meet the needs of the local community, region and state’s recreational and competitive swimmers.... due to the tremendous demand for these services in the local community, region, and state” is in conflict with the project objective of redeveloping “the City-owned site of the former Belmont Pool” and the project objective seeking to “locate the pool in an area that serves existing users.” From its conception, and continuing through the review process, the project values certain constituencies over others. The subtext of “community” is skewed to mean only 3rd District residents and members of the “aquatics community.” Both the site choice and the focus on competitive swimming now appear to have been foregone conclusions, with validation provided by a Stakeholders Advisory Committee dominated by local aquatics professionals and a single community meeting held in the 3rd district (citizen comments from that meeting include numerous objections to the project noting bias and lack of public input). If city council members now choose to behave as horse traders ( I let Suzie Price, 3rd District, have her pool, she gives me what I want), they will fail to represent their constituents’ best interests. While Long Beach may want to become an “aquatics capital,” we must first be a healthy city where every resident can acquire life saving habits and skills. Instead of merely serving “existing users,” we must identify and reverse inequities, building swimming pools, parks, and playgrounds where they are most needed.

I-52-2

In addition to reviewing Long Beach demographics re race and income, and researching drowning statistics re equal access to public facilities; the following CEQA mandates and selected passages from a report by The City Project are particularly relevant in revising the Draft EIR for the Belmont Pool Revitalization Project

1) CEQA mandates

- Enhance public participation in the environmental review process
- Identification of significant effects, alternatives and mitigation measures, as well as comments from the public and public agencies, and relevant information about significant effects should be made as early as possible in the process through scoping meetings, public notice, public review, hearings, and the judicial process.
- Failure to comply with CEQA to provide full disclosure of information during the CEQA process, which would result in relevant information not being presented to the public agency, would constitute a prejudicial abuse of discretion leaving the project proponent open to possible lawsuits.

I-52-3

I-52-4

I-52-5

2) Healthy Parks, Schools and Communities for All: Policy Report March 2009 by The City Project, Robert Garcia, Zoe Rawson, Meagan Yellot, and Christina Zaldana

Legal and Policy Justifications for Equal Access to Parks and Recreation

Federal and state laws prohibit intentional discrimination and unjustified discriminatory impacts for which there are less discriminatory alternatives in the provision of public resources, including access to parks and other public lands. An important purpose of the statutory civil rights framework is to ensure that recipients of public funds do not maintain policies or practices that result in discrimination based on race or ethnicity. The legislative, planning and administrative processes are available proactively to achieve compliance with civil rights laws as well as environmental, educational, and other laws. Title VI of the Civil Rights Act of 1964 and its implementing regulations guard against intentional discrimination based on race, color or national origin, and (2) unjustified discriminatory acts for which there are less discriminatory alternatives, by applicants for or recipients of federal funds. California laws also guard against intentional discrimination and unjustified discriminatory impacts by recipients of state funds under Government Code section 11135. In addition, California law defines environmental justice as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. Elected officials should be increasingly sensitive to, and held accountable for, the impact of their actions on communities of color, especially now that people of color are in the majority in California.

Principle 3. Infrastructure areas should be planned together in complementary rather than conflicting ways to serve health, education, human service, and environmental needs, to fulfill critical governmental and societal responsibilities; and to produce equitable results.

Principle 6. Revenues to support infrastructure improvements should be collected and allocated to distribute benefits and burdens fairly. Resources for parks and recreation should be targeted to the most underserved communities to overcome park, school, and health disparities, while generating state-wide benefits by diversifying access to and support for parks and green space.

Principle 7. Infrastructure decision-making should be transparent and include mechanisms for everyone to contribute to the planning and policymaking process.....Full environmental impact reports and statements, including assessment of health impacts, for parks and schools should be required to provide full and fair information and enable effective public participation. Audits and reports on park bond funds and park agencies can illuminate inequities and provide blueprints for reform. Community benefits agreements can help. Community oversight bodies can review infrastructure investments. Access to justice through the courts can be a profoundly democratic means of ensuring the fair distribution of public resources, particularly for traditionally disempowered communities. Public officials should recognize that litigation can provide them the hammer to get things done.



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MENU

## New Figures Reveal Racial Divide in Swimming Pool Deaths

11- and 12-year-old blacks drown at a rate 10 times higher than whites



LaShana McGee

s ([https://twitter.com/share?original\\_referer=/&text=New+Figures+Reveal+Racial+Divide+in+Swimming+Pool+Deaths&url=http://hcfkcc.org/news/new-figures-reveal-racial-divide-in-swimming-pool-deaths-3%2F%3Futm\\_source%3Dfacebook%26utm\\_medium%3Dsocial%26utm\\_campaign%3DSocialWarfare](https://twitter.com/share?original_referer=/&text=New+Figures+Reveal+Racial+Divide+in+Swimming+Pool+Deaths&url=http://hcfkcc.org/news/new-figures-reveal-racial-divide-in-swimming-pool-deaths-3%2F%3Futm_source%3Dfacebook%26utm_medium%3Dsocial%26utm_campaign%3DSocialWarfare))  
[http://www.facebook.com/sharer.php?u=http://hcfkcc.org/news/new-figures-reveal-racial-divide-in-swimming-pool-deaths-3%2F%3Futm\\_source%3Dfacebook%26utm\\_medium%3Dsocial%26utm\\_campaign%3DSocialWarfare](http://www.facebook.com/sharer.php?u=http://hcfkcc.org/news/new-figures-reveal-racial-divide-in-swimming-pool-deaths-3%2F%3Futm_source%3Dfacebook%26utm_medium%3Dsocial%26utm_campaign%3DSocialWarfare)  
 By Mike Sherry for the Hale Center of Journalism  
 August 8, 2014

LaShana McGee marvels at the exploits of her 4-year-old daughter around their neighborhood pool in Piper, Kan.

“She goes straight to the deep end. It’s crazy,” McGee says. “I don’t know why she does that, but she does. She just jumps right in, and she will swim her way back to the stairs where you get in.”

Attachment  
1

Having grown up in an African American household in the urban core of Kansas City, Mo., McGee made sure her two girls started swimming lessons early so they didn't grow up like their mom — with such a fear of the water that she needs the reassurance of her 9-year-old to brave the water slide at Oceans of Fun.

McGee's mother couldn't swim, so she didn't make it a priority for her kids.

But a [new national analysis \(http://www.cdc.gov/mmwr/preview/mmwrhtml/mm6319a2.htm?s\\_cid=mm6319a2\\_w\)](http://www.cdc.gov/mmwr/preview/mmwrhtml/mm6319a2.htm?s_cid=mm6319a2_w) of a dozen years' worth of death statistics illustrates the perils that such an indifference to the water poses.



Data from the U.S. Centers for Disease Control and

Prevention (CDC), released in the spring by Dr. Julie Gilchrist, found that African Americans under the age of 30 are far more likely to drown in swimming pools than people of other races and ethnicities in the same age range.

A spate of deaths earlier this summer reminded Kansas Citians just how dangerous the water can be, but Gilchrist says pool statistics are especially telling when it comes to racial disparities.

“Swimming pools take a lot of the other variables away,” she says. “There aren't currents, there aren't underwater obstacles, you know where the sides are, you know where the bottom is, so theoretically, with just basic swim skills, it should be very difficult to drown in a swimming pool.”

Water-safety advocates say true aquatic proficiency extends to knowing life-saving techniques. And, of course, knowing how to swim confers exercise benefits.

#### **Data**

According to the CDC:

- Nearly 4,000 persons die from drowning each year in the United States.
- Nearly 80 percent of the people who die from drowning are male.
- Drowning is one of the top three causes of unintentional death for people under the age of 30.
- Among 11- and 12-year-olds, blacks drowned in pools at 10 times the rate of whites between 1999 and 2010.

Locally, according to medical authorities, about two dozen people drowned in Kansas City, Mo., between 2008 and 2013. Wyandotte County logged nearly 30 drowning deaths going back nearly 15 years.

While Wyandotte County has not had a drowning this year, Jackson County had three in the span of eight days in June. All three were males under the age of 19, including a 7-year-old biracial boy who died in an apartment complex swimming pool at 3927 Willow Ave. The other deaths occurred in a park pond and a lake.

Minorities accounted for a majority of the drowning deaths in each jurisdiction, but they did not mirror the national data. Gilchrist says that's not surprising, given that national trends would not be reflected in a sample that includes little more than 50 cases.

It's not clear what role, if any, socioeconomic status plays in the national drowning statistics. Gilchrist could not say whether the disparity in drowning between blacks and whites persists across income brackets.

African Americans tend to predominate among the urban poor. According to the latest census figures, from 2012, the percentage of blacks living below the poverty level was more than double that of whites (28 percent vs. 13 percent).

But in trying to explain the disparity, Gilchrist and others say financial barriers are likely to blame for poor swimming proficiency among blacks. The problem is exacerbated by the dearth of municipal pools and by households struggling to cobble together jobs and so lacking the time to learn.

That rings true for McGee, the mother from Piper, who grew up at 63rd Street and Walrond Avenue.

Some kids in her neighborhood played in fountains, she says, but her mother did not think that was safe. The Swope Park pool was within walking distance, “but I think finances kept us from going because it wasn’t free — you had to pay — and so, I didn’t really care” about swimming.

### **KCK experience**

In Kansas City, Kan., Mayor Mark Holland says urban youth in his community suffer from a lack of access to aquatic facilities. The city has one public pool — and Holland says it’s little more than a cement pond in the Quindaro neighborhood.

“One pool for 155,000 people,” Holland says. “I mean, that’s crazy.”

Urban communities often struggle with the costs of operating and maintaining a public pool, he says.

Holland is hoping to address the imbalance through his plan for a “healthy campus (<http://www.kcpt.org/health/wyandotte-county-officials-face-trust-issue-healthy-campus/>)” near downtown, which would include a community center with an Olympic-sized pool.

His initial vision was to provide a setting for swim meets hosted by the Kansas City, Kan., school district. Holland credits school Superintendent Cynthia Lane with expanding that idea and working the pool into the physical education curriculum for second- and third-grade students.

“It makes a lot more sense to broaden the vision to teach every child how to swim,” he says.

He adds that you’re not likely to have much of a high school swim team if a lot of your students can’t swim.

### **To the rescue**

Nonprofit organizations in the metropolitan area also are working to improve swimming skills among African Americans and other urban youth.

The Boys & Girls Clubs of Greater Kansas City last month hosted a four-day water safety program for 5- to 9-year-olds at its facility at 2405 Elmwood Ave. The club offered the program in partnership with The ZAC Foundation (<http://www.thezacfoundation.com/>), a Connecticut-based foundation started in 2008 by a couple that lost their 6-year-old son when his arm became stuck in a pool drain.

And the YMCA of Greater Kansas City recently wrapped up its second year of providing water-safety instruction to kids participating in a summer camp put on by City Union Mission in Kansas City, which operates a homeless shelter and other programs.

One of the swimmers at last week's session in Platte City was 7-year-old Brea Powell.

While doing the front paddle, she says, she realized the importance of learning how to save someone in trouble "because you don't want other people to drown and be in heaven by themselves."

With basic steps, such as wearing a life jacket and ensuring adult supervision, drowning is 100 percent preventable, says Amanda Mitchell, senior aquatics director for the Kansas City YMCA.

The YMCA provides scholarships to ensure that money is not a barrier for families that want to provide swimming lessons to their kids.

Swimming, Mitchell says, is really a life skill that also provides an "avenue of constant health."

Gilchrist, the CDC researcher, agrees.

She says it's understandable that African American parents, unable to swim themselves, would stay away from the water to protect their kids. But the data illustrate the danger of doing that as those kids grow up and find themselves near a pool.

"So that fear and avoidance is not protective as the children age," Gilchrist says. "At some point, everyone is going to encounter water."

Attachment

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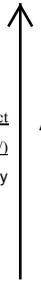
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Attachment

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**RESEARCH**

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*International Journal of Aquatic Research and Education*, 2010, 4, 9-18  
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## **Factors Affecting Minority Drowning**

**Nathan T. Martin and Dean Witman**

Research has revealed that racial or ethnic minorities historically drown at higher rates than the general population. Current research still has not identified or exposed fully the risk factors experienced by these groups that account for this disparity. By employing a review of the literature approach typical of the methods used in the humanities, the present article identifies many of the factors that explain this difference (e.g., age, sex, location, access, supervision, swimming lessons, and communication) and suggests future research that would help to illuminate the detailed circumstances that account for this ethnic gap in drowning rates (e.g., drowning-related research that takes race and ethnicity into account more consistently).

Research has revealed that racial and ethnic minorities historically drown at higher rates than the general population (Centers for Disease Control, 2008). Recent authors (Hastings, Zahran, & Cable, 2006; Irwin, Drayer, Irwin, Ryan, & Southall, 2008; Wiltse, 2007) have focused primarily on issues related to overt or unintentional discrimination and, more specifically, the limited opportunities minority groups have had to swim in places generally considered safe. Although overt discrimination may have been a factor, it did not fully explain why some minority groups, mainly African-Americans, have had less access to the most desirable swimming areas or have poorer prospects for receiving instruction in swimming or water safety.

Therefore, the authors designed the current study to more fully identify and expose the risk factors experienced by these groups that account for a greater proportion of the disparity in drowning rates. For example, one study found that drowning rates among White children younger than five years of age were greater than among Black children. In contrast, from ages five through 19 years old, the racial disparity in drowning rates was inverted (Branche-Dorsey, Russell, Greenspan, & Chorba, 1994). These researchers concluded that younger White children most likely had more access to aquatic settings at younger ages, accounting for the gap before five years old, but they failed to account for or investigate the inverse gap among Black children who were older than five years.

The present article identifies many of the factors that explain these differences and suggests future research that might help to make clear the detailed circumstances that account for this gap. More thoroughly examining the risk factors associated with minority drowning hopefully will stimulate conversation about whether more accessible swimming infrastructure should be a greater public priority and specifically whether more infrastructure investment should occur in minority neighborhoods.

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Attachment  
2

## Method

The primary research purpose of this investigation was to identify the factors that explain why racial or ethnic minorities drown at higher rates than the general population. A review of the literature approach, typical of the methods used in the humanities, was used to conduct this investigation. After a cursory examination of the drowning literature, an initial set of over 40 potential variables that might constitute factors relating to the disproportionately high minority drowning rates were entered as keywords into ResearchPro, a federated-search application that scans multiple databases (including ABI/INFORM Global, Academic One File, Cumulative Index to Nursing and Allied Health Literature, Cambridge Scientific Abstracts, Journal Storage [JSTOR], Nursing and Allied Health Coalition, Science.gov, Science Direct, and YourJournals@OVID). A federated database system is a type of meta-database management system (DBMS) that transparently integrates multiple autonomous database systems into a single “federated” database.

Because of limitations of the search application, access to all potential articles that exist on the identified variables was incomplete. To alleviate this limitation, the reference lists of foundational articles on drowning were reviewed, and the Google Scholar search engine was employed to exhaust further potential resources of interest. Combined with primary keywords like *drowning* and *minority*, a partial list of factors that were used in the initial search included the following:

- Location (including supervision, access to definitive medical care, warning signs, safety equipment, residential/public/neighborhood/open water)
- Access (infrastructure for swimming, swimming lessons)
- Education (swimming lessons, formal education, swimming experience)
- Fear (as a deterrent to swimming altogether or as an enabler to avoid swimming lessons that might prevent drowning)
- Risk-taking behavior (swimming alone, at night, in unguarded settings)
- Alcohol (as an aggravating factor or as a subject of legislation)
- Immediate prior activity (activity in which victim was engaged before drowning, such as boating or hiking)
- Immediate prior conditions (maintenance, weather, water clarity, distractions from supervision, crowding, time of year)
- Engineering controls (absence or presence of government mandates)
- Other aquatic or drowning studies that specifically controlled for race or ethnicity

Once identified and collected, the authors reviewed each article for evidence that either supported or rejected a relationship between the disproportionate minority drowning rate and the proposed factor. Specifically, the authors used a null hypothesis model proposing that no relationship between the disproportionate minority drowning rate and the factor of interest. More specifically, the authors conducted an initial cursory examination to determine whether race or ethnicity was minimally addressed as part of the study. If race or ethnicity was not minimally taken into account as a variable in the study, then the study was excluded. If race or ethnicity was minimally taken into account, the authors examined whether the study under

consideration provided evidence that either supported or rejected a relationship about the role of race or ethnicity on drowning. If a study provided evidence that a relationship existed, its contribution was included within the Results section and the authors elaborated upon its relevance in the Discussion and Recommendations sections.

A total of 26 articles met the criteria where race or ethnicity was minimally addressed as part of the study. The authors chose to exclude a bibliography as part of this article because it included a cursory review of hundreds of drowning-related articles that either did not minimally address race or ethnicity or only helped to identify other resources to further exhaust the search process. Since the present article has not specifically used these other resources as direct contributors, citations do not appear. Interested readers should contact one of the article authors for more information about the list of other resources.

## Results

Based on the final review of 26 articles where either race or ethnicity was minimally addressed as part of the study, the authors identified factors that provided the clearest evidence related to the primary research question. These factors included age, sex, and location (Brenner, Trumble, Smith, Kessler, & Overpeck, 2001), access (Hastings et al., 2006), supervision (Landen, Bauer, & Kohn, 2003), swimming lessons (multiple studies, including Brenner et al., 2001; Dawson, 2006; Saluja, Brenner, Trumble, Smith, Schroeder, & Cox, 2006; Sanford, Givens, Radisch, & Smith, 2001) and communication (Agócs, Trent, & Russell, 1994).

### Age

Regarding these factors, particularly key findings by Brenner et al. (2001), included that among one to four year old males, Blacks drown at lower rates than do Whites. Then, after ten years of age, Black males drown at greater than ten times the rate of White males of the same ages. Branche-Dorsey et al. (1994) and subsequently Saluja et al. (2006) both attributed the higher drowning rate among younger White children to these children's greater exposure to residential swimming pools.

### Sex

Articles about drowning frequently point out the disproportionate male drowning rate and several attempted to explain why this discrepancy exists irrespective of other factors. For example, by posing the question, "Why Are Most Drowning Victims Men?" Howland, Hingson, Mangione, Bell, and Bak (1996) sought to explain sex differences in aquatic skills and behaviors and their corresponding influence on drowning rates. While the researchers had respondents identify themselves as White (non-Hispanic), African American, Hispanic, or Asian, the study provided no direct explanation for sex differences in drowning rates across race or ethnicity.

Factors that showed a relationship between risk-taking behavior and higher male drowning rates included findings that men generally considered themselves better swimmers even though women were more likely to have received swimming instruction and to have received more hours of swimming instruction. They also

found that males were more likely than females to consume alcohol during aquatic activities and in greater amounts and engage in other risk-taking behaviors such as swimming alone, at night, and in unguarded settings, and boating without a life jacket (Howland et al., 1996).

As mentioned previously, Brenner et al. (2001) also pointed out that Black males, older than the age of five years, drown at higher rates than White males of the same age. While this difference confounds the variables of sex and race, the researchers attributed the difference to the characteristics of the settings in which aquatic activity occurred rather than to behavioral differences. For example, they felt the differences could be explained by more crowded conditions for minorities who experienced higher drowning rates.

### Location

In addition to the sex-based factor Brenner et al. (2001) mentioned, they also provided the important finding that drowning rates in *swimming pools* among Black males are much higher than children older than five years of age and that, even though drowning rates were low for both races among female children of this age, Black females were at greater risk of drowning in swimming pools compared with White females of the same age. This study suggested that the swimming pools in which Black adolescent males swim are inherently less safe because they may be more crowded, have poorer supervision, and their staffs may not be as skilled in rescue and resuscitation. Saluja et al. (2006) provided the additional insight that differences in the location where people of different races drown persist even when researchers have adjusted for income levels.

### Access

Hastings et al. (2006) showed that a relationship exists between the disproportionate minority drowning rate and the extent to which at-risk groups are subject to “the principle of social exclusivity that limits access” to swimming as an activity and swimming infrastructure. This study examined minority participation rates in swimming, which has implications for social exclusivity, as well as race-specific drowning rates. The study found that access to instructional and competitive programs, as well as the infrastructure that supports these programs, affects age, sex, and particularly race differences in swimming participation.

### Supervision

Many studies concluded with recommendations that parents and the public as a whole watch over people participating in aquatic activity and thereby ensure that they are safe and acceptably behaved. Landen et al. (2003), who examined the role of supervision and drowning among children six years old and younger in Alaska and Louisiana, found that minority groups, specifically Alaska Natives and Louisiana Blacks, had higher drowning fatality rates due to less adequate or absent supervision compared with other groups. While numerous additional studies also addressed supervision and drowning rates, none explicitly included race/ethnicity as a factor and thus were excluded because they had no bearing on the primary research question.



## Swimming Lessons

Evidence supported an inverse relationship between fewer opportunities to take swimming lessons and higher minority drowning rates. Brenner et al. (2001), Saluja et al. (2006), Sanford et al. (2001), and Dawson (2006) have all provided evidence demonstrating a relationship between the disparity in drowning rates and the reduced tendency of members of minority groups to receive swimming instruction.

## Communication

In a study that was based exclusively in Imperial County, California, a border region between the United States and Mexico, Agócs et al. (1994) found the most frequent activity before drowning was illegal entry into the United States. In addition, all of the illegal entrants with known ethnicity were Hispanic, providing evidence of a possible English-Spanish language barrier with respect to communication. This study concluded with a recommendation that to reduce drowning fatalities, authorities should consider installing warning signs with universal symbols and broadcasting public service announcements in Spanish in border towns.

## Other Factors

In preparing for the scrutinized review, authors identified numerous factors that might help to explain the differential in drowning rates. In several instances, we found articles that took into account a risk factor of interest, but the studies did not truly consider race or ethnicity, or another factor considered a reasonable proxy, in addition to these other variables. These factors included immediate prior condition of cold weather (Hedberg, Gunderson, Vargas, Osterholm, & Macdonald, 1990) and family members' education (Quan, Bennett, Cummings, Henderson, & Del Beccaro, 2001). As a result, the authors could neither support nor reject the presence of a relationship based on a review of these studies.

For other factors, such as activity immediately before drowning, that is, swimming, wading, or attempting a rescue (Browne, Lewis, & Stark, 2003; Smith & Brenner, 1995), the authors found that previous research was unable to explain the differences in drowning rates by race or offered only speculation about what the reasons might be. In addition, the authors examined other factors, such as a greater tendency to engage in high-risk activities such as swimming alone or using alcohol (Howland et al., 1996), or a relative absence of engineering controls like residential fencing (Smith & Brenner, 1995). The authors were unable to establish any significant evidence of a relationship between these factors and higher minority drowning rates.

One factor that was not identified initially was self-reported swimming ability. This factor was identified through the literature review and peer review process and included in the current study. Specifically, Gilchrist, Sacks, and Branche (2000) reported that 37% of the general adult U.S. population self reported possessing limited swimming ability. When examining race/ethnicity separately, 62% of African Americans self-reported not knowing how to swim, compared with 32% for Whites, 47% for Asians, and 44% for Hispanics. In addition, Moran (2008) found significant differences among ethnicities in self-reported abilities, specifically swimming and performing CPR, as well as appropriate water safety behaviors like drinking alcohol

and wearing dangerous clothing/footwear. Moran also found that his respondents' perceptions of risk posed by rock fishing, their self-efficacy, and their preventive behaviors were also significantly different when compared across ethnic groups.

## Discussion

The factors that provided the most direct support for detecting a relationship between the drowning rate and a given factor were the factors of age, sex, and location (Brenner et al., 2001), access, and, specifically, social exclusivity (Hastings et al., 2006), supervision (Landen et al., 2003), swimming lessons (multiple studies including Brenner et al., 2001; Dawson, 2006; Saluja et al., 2006; Sanford et al., 2001), and to some extent communication (Agócs et al., 1994).

### Age

While several studies have shown that comparative drowning rates differ across children's ages, the reasons for the differences are not clear. For example, although multiple studies have suggested that White children's increased exposure to residential swimming pools might balance the racial disparity in drowning rates among infants and toddlers, there was little empirical basis supporting this idea. The other factors that account for the higher minority drowning rate as children age, particularly the dramatically increased drowning rate among Black males over ten years old, have not been explained fully.

### Sex

Based on the examination of Howland et al. (1996), one might settle on the idea that the higher male drowning rate for Black adolescents is due to a greater inclination toward risk-taking behavior, such as consuming alcohol during aquatic activities or swimming alone or in unguarded settings. Not having access to the researchers' raw data, however, does not allow for this claim to be substantiated. Nonetheless, it is recommended that more research studies be conducted to determine why higher drowning rates are so much higher for minority males, particularly among African American teenagers.

### Location

A common observation encountered among the studies was that minorities drown more frequently in swimming pools. In contrast, Smith and Brenner (1995) suggested that the higher drowning rate for Blacks and Native Americans they observed might be due to increased aquatic activity in remote, unsupervised locations. These researchers appear to have based their statement on the results of Davis, Ledman, and Kilgore's (1985) study in the sparsely populated, mostly desert state of New Mexico. A small proportion of the cases in Davis et al.'s study (1985), just four out of 191, were Black. While the assertion about remote, unsupervised locations might be valid for some minority groups, such as among Native Americans, the present review found no other support for this assertion among minorities generally. Nonetheless, as Saluja et al. (2006) suggested, examining cultural factors and

their definitions may be important for addressing drowning prevention efforts in different geographical locations and cultures.

### **Access**

In addition to the apparent challenge to the more common observation that minorities drown more frequently in swimming pools, Smith and Brenner (1995) also introduced the possibility that groups that are denied access to relatively safe swimming areas (e.g., guarded pools and beaches) might tend to perform aquatic activities in remote, unguarded settings where they are even more likely to drown. Brenner et al. (2001) and others have characterized the access situation as one in which the swimming pools available to minorities are more likely to be public and have poorer levels of supervision. In the case of many hotel/motel pools, the operators often do not provide any supervision at all and simply post “swim at your own risk” signage. Based on the historical perspective of Dawson (2006), limited pool access might not be the sole or primary cause of the Black community’s rejection of learning to swim but instead a “coherent choice no longer to swim in natural waterways” (p. 1355). As stated previously, cultural factors might be at work here that deserve further investigation.

### **Supervision**

Research has generally found that adequate adult supervision tends to mitigate the risk of drowning. Absent, poorer, less, or inconsistent supervision largely explain higher minority drowning rates. Howland, Birckmayer, Hemenway, and Cote (1998) conducted a study that focused on the effect of minimum legal drinking age laws, revealing that lower drowning rates have generally corresponded to increases in “urbanicity,” a factor often associated with racial and ethnic minorities, and according to those researchers, better supervision. Although it was undeterminable whether Howland et al. (1998) defined urbanicity as the site of the drowning incident or the victim’s residence, urbanicity generally refers to the degree to which a location is considered urban based on a high population density as the defining element. Based on this research, one might predict that minority groups, which are often concentrated in urban areas where better supervision is available, would drown at lower rates than the general population. Despite the age of this study and that it did not explicitly take race or ethnicity into account, it does raise challenging questions that further research might help to explain. For example, to the extent that it failed to show a relationship between drowning and minimum legal drinking age laws, the study pointed out that passing legislation where no scientific support exists might have different consequences than the ones intended. The study also called attention to the possibility that governmental action designed to address one issue might have the inadvertent effect of making another problem dramatically worse.

### **Swimming Lessons**

The pediatric community has held for several years that children older than four years need to learn to swim to lessen their risk of drowning (American Academy of Pediatrics Committee on Injury, Violence, and Poison Prevention, 2003). A more recent study (Brenner et al., 2009) found that formal swimming lesson participation



could explain 88% of the reduction in drowning risk, even among one to four year old children who many would have considered too young to benefit from this instruction. It is not surprising that, when race or ethnicity are taken into account, groups whose participation rates in swim lessons are lower than the general population are more likely to drown.

## Communication

The recommendations of Agócs, Trent, and Russell (1994), while not applicable across the board, remind us that although it might appear to be common sense, language difficulties might explain a portion of the differences in the drowning rates between minorities and the general population. Because this study focused on drowning rates along the United States-Mexico border, it pointed out that interventions based on communication must be neutral with respect to language. Communication neutrality may include using universal symbols or accounting for the diverse language capabilities of the audience such as through the use of well trained translators.

## Other Factors

For several factors, such as family members' education levels and immediate prior conditions, the current study found no evidence in support of a relationship within the studies examined. This determination came about most frequently from the studies' failure to consider race or ethnicity, or a reasonable proxy, along with the other potential risk factors. One possible explanation for this failure is that current data systems do not record pertinent details surrounding a drowning incident, including the characteristics of the injured person, so that researchers can understand better the relationships between fatal and nonfatal drownings and the proximate conditions present at the time death or injury occurs. The government might alleviate this situation if it required hospitals as a condition of reimbursement under government health insurance programs to capture the detailed external causes of an injury in their hospital discharge or emergency department data systems.

Where the current study was unable to find evidence of a relationship between higher minority drowning rates and any one particular variable, we recommend that future researchers should attempt to duplicate or disprove earlier findings rather than disregarding the potential impact of such variables. If anything, this review of the literature related to minority drowning reveals how scant knowledge is about this phenomenon and showed how much more work is needed. For example, Hastings, Zahran, and Cable (2006) alluded to the puzzle they encountered regarding the increased rate of drowning that Blacks experience as their opportunities for exposure to the water increase. One would think that increased opportunities to swim would result in more experience, better swimming ability, more knowledge of water safety, and consequently lower drowning rates. As this group of researchers suggested, Blacks who live in areas where swimming infrastructure exists might still swim fewer times a year than Whites do, and therefore having access to greater opportunities might not correspond to a lower drowning risk. Because gaps in our understanding like this one continue to exist, many questions exist for future researchers to replicate or refute the findings of previous studies.



As for self-reported swimming ability, previous articles such as Gilchrist et al. (2000) and Moran (2008) have shown that members of minority groups typically report lower levels of water safety-related skill than the population as a whole. This research noted this finding among highly disparate groups from African Americans to indigenous ethnic populations in New Zealand. Because the differences were reported by the respondents themselves, rather than measured by an objective test of their abilities, these findings again call into question to the objectivity of communication and cultural factors previously mentioned. While swimming ability may not translate directly into a higher degree of safety, being able to swim certainly increases one's chances of surviving inadvertent water entry such as falling out of a boat or sliding down a riverbank. Even though people who cannot swim well usually limit their exposure to water, the life-saving benefit of being able to swim should not be discounted.

## Conclusion

Much evidence supports the contention that, despite the overall trend toward decreased drowning rates, minority groups continue to drown at higher rates than the population as a whole. The present study reviewed much of the current literature and noted that numerous studies have omitted race or ethnicity as a main or mediating factor. The reasons for this omission are puzzling and unexplainable simply because it should be an easy factor to isolate in an investigation. As such, future drowning-related research should take race or ethnicity into account more consistently. Hospitals, providers of prehospital care, and other emergency response agencies should upgrade their injury surveillance systems to capture these variables and other important information uniformly. Only by identifying the detailed circumstances associated with drowning incidents will it be possible to eliminate the race-specific gap in our understanding about drowning rates that currently exists and has existed historically. Current efforts to bring about more complete and reliable collection of drowning-related data will provide researchers and practitioners new insights into existing and proposed interventions that might favorably reduce drowning rates for both minority groups and the general population. This review also provides support for efforts to address more of the relevant risk-related factors in future research.

## References

- American Academy of Pediatrics Committee on Injury, Violence, and Poison Prevention. (2003). Prevention of drowning in infants, children, and adolescents. *Pediatrics*, *112*(2), 437–439.
- Agócs, M.M., Trent, R.B., & Russell, D.M. (1994). Activities associated with drownings in Imperial County, CA, 1980-90: Implications for prevention. *Public Health Reports*, *109*(2), 290–295.
- Branche-Dorsey, C.M., Russell, J.C., Greenspan, A.I., & Chorba, T.C. (1994). Unintentional Injuries: The problems and some preventive strategies. In I.L. Livingston (Ed.), *Handbook of Black American Health: The mosaic of conditions, issues, policies and prospects*. Westport, CT: Greenwood Press.
- Browne, M.L., Lewis, E.L., & Stark, A.D. (2003). Unintentional drownings among New York state residents, 1988–1994. *Public Health Reports*, *118*, 448–458.

- Brenner, R., Saluja, G., Haynie, D., Trumble, A., Cong, Q., Klinger, R. et al. (2009). Association between swimming lessons and drowning in childhood: A case-control study. *Archives of Pediatrics & Adolescent Medicine*, *163*(3), 203–210.
- Brenner, R.A., Trumble, A.C., Smith, G.S., Kessler, E.P., & Overpeck, M.D. (2001). Where children drown, United States, 1995. *Pediatrics*, *108*(1), 85–89.
- Centers for Disease Control & Prevention. (2008). Water-related injuries: Fact sheet. Retrieved May 13, 2009 from <http://www.cdc.gov/ncipc/factsheets/drown.htm>
- Davis, S., Ledman, J., & Kilgore, J. (1985). Drownings of children and youth in a desert state. *The Western Journal of Medicine*, *143*(2), 196–201.
- Dawson, K. (2006). Enslaved swimmers and divers in the Atlantic world. *The Journal of American History*, *92*(4), 71 pars. Available at: <http://www.historycooperative.org/journals/jah/92.4/dawson.html>. Retrieved October 18, 2008.
- Gilchrist, J., Sacks, J.J., & Branche, C.M. (2000). Self-reported swimming ability in U.S. adults, 1994. *Public Health Reports*, *115*, 110–111.
- Hastings, D.W., Zahran, S., & Cable, S. (2006). Drowning in inequalities: Swimming and social justice. *Journal of Black Studies*, *36*(6), 894–917.
- Hedberg, K., Gunderson, P.D., Vargas, C., Osterholm, M.T., & Macdonald, K.L. (1990). Drownings in Minnesota, 1980-85: A population-based study. *American Journal of Public Health*, *80*(9), 1071–1074.
- Howland, J., Hingson, R., Mangione, T.W., Bell, N., & Bak, S. (1996). Why are most drowning victims men? Sex difference in aquatic skills and behaviours. *American Journal of Public Health*, *86*(1), 93–96.
- Howland, J., Birkmayer, J., Hemenway, D., & Cote, J. (1998). Did changes in minimum age drinking laws affect adolescent drowning (1970-90)? *Injury Prevention*, *4*(4), 288–291.
- Irwin, R., Drayer, J., Irwin, C., Ryan, T., & Southall, R. (2008). *Constraints impacting minority swimming participation*. Colorado Springs, CO: USA Swimming.
- Landen, M.G., Bauer, U., & Kohn, M. (Feb 2003). Inadequate supervision as a cause of injury deaths among young children in Alaska and Louisiana. *Pediatrics*, *111*(2), 328. Available at: Academic OneFile via Gale: <http://find.galegroup.com/itx/start.do?prodId=AONE>. Retrieved November 06, 2008.
- Moran, K. (2008). Rock-based fishers' perceptions and practice of water safety. *International Journal of Aquatic Research and Education*, *2*, 128–139.
- Quan L, Bennett E, Cummings P, Henderson P, Del Beccaro MA. (2001). Do parents value drowning prevention information at discharge from the emergency department? *Annals of Emergency Medicine*, *37*, 382–5.
- Saluja, G., Brenner, R.A., Trumble, A.C., Smith, G.S., Schroeder, T., & Cox, C. (2006). Swimming pool drownings among US residents aged 5-24 years: understanding racial/ethnic disparities. *American Journal of Public Health*, *96*(4), 728–733.
- Sanford, C.P., Givens, J., Radisch, D., & Smith, J.B. (2001). *A review of the epidemiology of unintentional drowning deaths of children in North Carolina from 1996 through 2000*. Raleigh, NC: North Carolina Department of Health and Human Services, Division of Public Health.
- Smith, G.S., & Brenner, R.A. (1995). The changing risks of drowning for adolescents in the U.S. and effective control strategies. *Adolescent Medicine (Philadelphia, Pa.)*, *6*(2), 153–169.
- Wiltse, J. (2007). *Contested waters: A social history of swimming pools in America*. Chapel Hill: University of North Carolina Press.



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03 February 2016, 09:00am

# Exploring the Racial Disparities in Competitive Swimming

Attachment  
3



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Attachment  
3

Photo Courtesy: Peter H. Bick

*By Molly Lloyd\*, Swimming World College Intern*

Depending on where you are, if you look around you, at the teams that you're on, at the teams against whom you race, and even at the Olympic swimmers, you'll realize that swimming tends to be a sport dominated by white people. On the 2012 Olympic team (<http://usaswimming.org/ViewNewsArticle.aspx?TabId=0&itemid=4537&mid=8712>), only three out of the 24



swimmers on the men's team, and two out of 25 swimmers on the women's team, were people of color.

While it might be hard to realize – or just easier for some of us to ignore – we need to address the fact that competitive swimming, while near and dear to our hearts, seems to have race problem.

**What does the research say?**



Photo Courtesy: Peter H. Bick

Attachment  
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In 2014, USA Swimming released its official report ([http://www.usaswimming.org/\\_Rainbow/Documents/a31bc239-b31f-4834-87bf-accb09e8a834/Statistics-2014.pdf](http://www.usaswimming.org/_Rainbow/Documents/a31bc239-b31f-4834-87bf-accb09e8a834/Statistics-2014.pdf)) on the demographics of their 2014 year-round members. Under the 'ethnicity' category, 31.2 percent of members identified as white, while only 5.3 percent identified as Asian, 2.9 percent identified as Hispanic or Latino, and 1 percent identified as black. While it is important to note that around 55 percent of participants did not note their ethnicity, there is still a stark difference in rate of participation based on race.

Along with this racial disparity in participation, there is also a huge disparity when it comes to likelihood of drowning. A 2012 study (<https://www.swimmingworldmagazine.com/news/wp-content/uploads/2016/02/MYERS-AND-CUESTA-PAPER-APPAM-2012.pdf>) published by the University of Minnesota notes that "the fatal drowning rate of African-American children ages 5 to 14 is 3.1 times that of white children in the same age range." In their conclusion, they noted that there is a distinct, unambiguous link between swimming ability/participation in competitive swimming and rates of drowning.

If there is a direct link between rates of participation in competitive swimming and rates of drowning, the question becomes, why are people of color – specifically Black Americans – so underrepresented in the sport of swimming? What are the possible causes of these racial disparities?

### **Explaining the racial disparities.**

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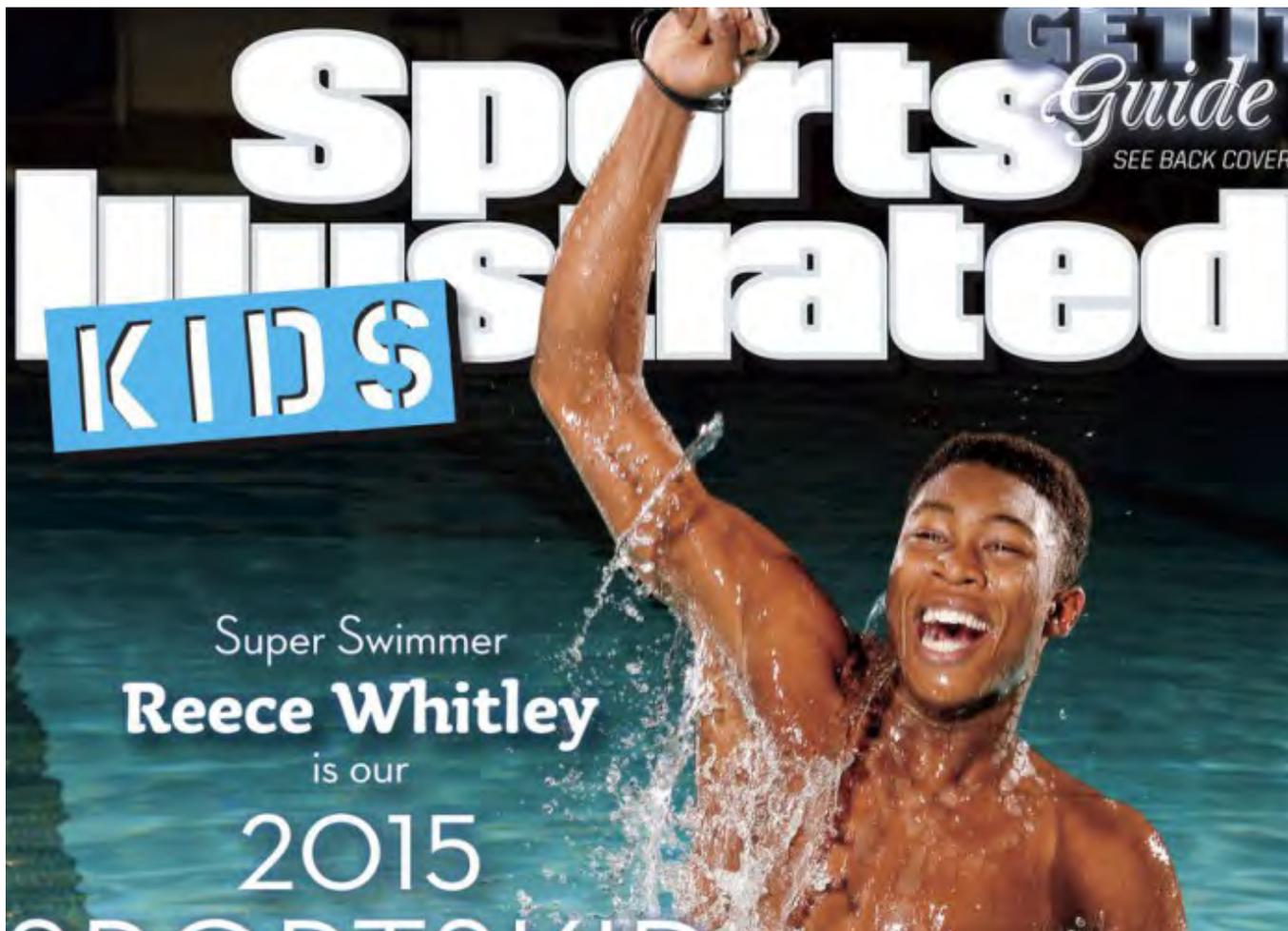


Photo Courtesy: Sports Illustrated

A 2008 survey ([http://www.usaswimming.org/\\_Rainbow/Documents/8ff56da3-ef9c-47ab-a83e-57b72efea474/2008\\_minority\\_swimming\\_research.pdf](http://www.usaswimming.org/_Rainbow/Documents/8ff56da3-ef9c-47ab-a83e-57b72efea474/2008_minority_swimming_research.pdf)) conducted by the USA Swimming Foundation found that there are a number of variables that have a significant impact on whether or not a child can swim, including “the child’s as well as parent’s fear of child drowning/being injured while swimming, family environment (such as parent swim ability, parent encouragement, family swim participation, family exercising regularly, household income, and parent/guardian education), access to a pool, and awareness or admiration of a highly competitive swimmer.”

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Children whose parents swam and encouraged them to swim had a much lower chance of drowning and a much higher chance of participating in swimming competitively. The study reported that Black American children were much less likely to have a parent who knew how to swim, have friends who knew how or enjoyed swimming, or have a parent who encouraged them to learn to swim. Knowing this, it would make sense to say that one cause of the underrepresentation of Black Americans in competitive swimming is that they just aren't encouraged to participate.



Photo Courtesy: Brenton Tse

Attachment  
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Another cause is the issue of access. Historically, during the first half of the 20th century and up until the Civil Rights Act was passed in 1964, segregation was common throughout the United States, and this led to Black Americans during this time to not have access to pools. Even after segregation was made illegal, there was still a disparity in where pools were located: pools tended to be located in traditionally white neighborhoods, making it difficult for Black Americans to learn to swim.

Even now, there are issues with access. Most swim teams that aren't school teams cost a lot of money to join; you have to pay for the membership as well as the suits and caps and goggles to get you through the season. Transportation can also become an issue, as it requires a fair amount of time and money. While the money issue affects all lower class people, it seems to disproportionately affect lower class Black Americans. The issue of expense is supported by the USA Swimming survey, which found that kids who came from households with a lower annual income were less likely to know how to swim.

### How are things changing?

Attachment

3



Photo Courtesy: USA Swimming Foundation

With all of this evidence that competitive swimming in America has a race problem we have to ask, what can we do?

One institutional program that could work would be high schools having a swimming proficiency requirement in order for their students to graduate. High schools that have pools would be able to make sure that all of their students, regardless of race, would be at a lower risk of drowning.

Representation is also something very simple that can go a long way. Elite swimmers like **Cullen Jones**, **Lia Neal**, and **Simone Manuel** are setting an incredible example and paving the way for black swimmers, both young and old, to get involved in competitive swimming. Even **Reece Whitley**, a 16-year-old, incredibly fast swimmer who swims for Penn Charter is making a difference. For kids, seeing someone who looks like them represented in the media and in sports will increase their interest in the sport and allow them to believe that they really can participate.

Another question we can be asking is, what is already being done?



Attachment  
3

Two-time Olympian **Cullen Jones** (<http://www.blackenterprise.com/lifestyle/cullen-jones-olympics-and-black-swimmers/>) has taken it upon himself to change the perception that black people can't swim. Jones started swimming as a hobby and then competitively after he almost drowned at a local water park, Dorney Park. After swimming throughout his childhood and through college, he began his Olympic career. Soon after the 2008 Olympics, Jones signed on to be USA Swimming Foundation Ambassador for the Make a Splash (<http://makeasplash.org>) initiative.

Jones and Make a Splash have made it their mission to spread enthusiasm about learning to swim and to encourage kids of all ages and races to learn to swim, because it is a vital and life saving skill. The Make a Splash initiative even goes on annual tours around the country, making stops in Freeport, TX; Alliance, LA; San Antonio, TX; and Chicago, IL. In these cities, multiple Olympic swimmers got in the pool with local kids to work with them on their swimming skills. It's programs like Make a Splash that are really going to make a difference when it comes to eliminating the racial disparities in swimming.

According to the USA Swimming Foundation, between 2004 and 2015, club swimming's black membership increased by 55 percent and its Hispanic/Latino membership increased by 77 percent. Things are changing for the better ([http://sports.yahoo.com/news/how-the-color-of-american-swimming-is-finally-changing-074627951.html?soc\\_src=mediacontentsharebuttons&soc\\_trk=tw](http://sports.yahoo.com/news/how-the-color-of-american-swimming-is-finally-changing-074627951.html?soc_src=mediacontentsharebuttons&soc_trk=tw)) and the world of competitive swimming is becoming less and less whitewashed, but even so, we have a lot of progress to make.

\*Please note: I am a middle class, white woman, which affects my perception of the world around me, so please feel free to let me know if I have said something wrong or need correcting.

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## 4 COMMENTS

Attachment  
3



Mastersswimmer

February 3, 2016

"...the world of competitive swimming is becoming less and less whitewashed..." Does that mean professional basketball is 'blackwashed'? After all, in a nation that is 13% black, some 80% of NBA players are African-American. Can't swimmers just be swimmers without being labeled by color? This IS the 21st Century.



Crazycat

February 3, 2016

Stop- stop- stop making racial issues when there are none.



Coach Jim

February 4, 2016

Completely disagree with the people suggesting this issue should not be looked at. If nothing else, the access issue is real and needs to be addressed. Outreach is vital to our sport and if you do not want to engage in creating opportunities and access, the least you can do is not disparage the people who are. The knee jerk comments may be at the fact that it puts people like Jones, Neal, and Manuel in a position where they are carrying more weight than they deserve and more than white athletes. They didn't get to where they are by buckling under pressure but I'm sure they appreciate your efforts to ignore race. Thank you for a thoughtful article and thank you to teams, coaches, pool operators, and communities working to provide opportunity and encourage diversity.

Attachment  
3

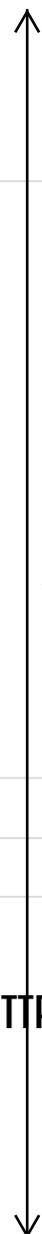


Elizabeth Gibbens

February 4, 2016

The race disparity in competitive swimming, and public pools, are real. This isn't a discrimination issue that requires affirmative action, but the fact that there is a 3:1 drowning rate (as you stated) is cause to take notice. The first step is to educate children to the basics of water safety. The Earth is 75% water! Corpus Christi public school system has a mandatory program to teach basic water safety and swimming to ALL elementary school kids, for FREE. Start with eliminating the fear and the barriers that swim lessons are for the "privileged" then add swim clubs to the mix and you get higher participation across the board. Competing with football in Texas is a big enough tackle, but competing with a multi-generational un-encouraging family structure, then you can hang up your fins. There is opportunity for improvement, but it's not through highlighting past segregation and missed opportunities. Personally, I think using the public pools for positive "safe zones" seems like a better use of our tax money and time.

Attachment  
3



**MORNING SWIM SHOW**  
 ([HTTP://TV.SWIMMINGWORLDMAGAZINE.COM/SHOWS/THE-MORNING-SWIM-SHOW](http://tv.swimmingworldmagazine.com/shows/the-morning-swim-show))

**FEATURED VIDEO**  
 ([HTTP://TV.SWIMMINGWORLDMAGAZINE.COM/SHOWS/TECH-TALK](http://tv.swimmingworldmagazine.com/shows/tech-talk))



([http://www.youtube.com/embed/LpUXIOY1Wfo?](http://www.youtube.com/embed/LpUXIOY1Wfo?rel=0&hd=1&autoplay=1) 2m 30s  
rel=0&hd=1&autoplay=1)



([http://www.youtube.com/embed/xGBjYyq42y8?](http://www.youtube.com/embed/xGBjYyq42y8?rel=0&hd=1&autoplay=1)  
rel=0&hd=1&autoplay=1)



(<http://>



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⊕

Attachment  
3

**ANNA CHRISTENSEN**  
**LETTER CODE: I-52**

**DATE: June 16, 2016**

**RESPONSE I-52-1**

This comment states that the commenter is resubmitting this comment letter with noted corrections. The revised version of this submission is included in the content of Comment Letter I-52.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-52-2**

This comment raises concern that the proposed Project would not provide equal access to pool facilities for all Long Beach residents. The comment makes recommendations related to locating the proposed Project on alternative sites, such as Harry Bridges Memorial Park, or splitting the project for placement within multiple City of Long Beach (City) Districts. The commenter notes that special consideration should be focused on the funds required for the proposed Project and how it benefits citizens of all City Districts.

A large majority of the funding for the proposed Project would originate from Tidelands funds, which are legally mandated to fund development within the City's Tidelands area. Therefore, developing the proposed Project at alternative location in the City outside of the Tidelands area with Tidelands funds would be expressly prohibited. Due to the cost of the Project, developing the Project outside of the Tidelands area without the Tidelands funds would also be infeasible due to a lack of funding sources. Furthermore, the primary objective of the Project is to replace the former facility in its original location. It should also be noted that the proposed Project was initiated prior to the demolition and removal of the old facility, as it has long been the City's intention to replace the old facility on the same site.

An analysis of alternative project locations was included in Chapter 5.0, Alternatives, of the Draft EIR. As part of this analysis, it was determined that the proposed alternative locations would meet the Project Objectives to a lesser degree than the Project. Therefore, none of these alternatives were identified as the Environmentally Superior Alternative or the Preferred Alternative. Therefore, the City intends to proceed with the design as included under the proposed Project.

**RESPONSE I-52-3**

This comment states that the California Environmental Quality Act (CEQA) mandates enhanced public participation in the environmental review process.

The City has conducted 9 public meetings, four public study sessions (Planning Commission, Marine Advisory, and City Council [two City Council meetings-one in 2014 and one in 2016]) and several other outreach meetings to engage citizen participation in developing the proposed Project. Furthermore, the Initial Study and the Draft EIR prepared for the Project both allowed for a public review period during which the public could provide commentary on the Project. The public review period for the Initial Study was 30 days, consistent with the *State CEQA Guidelines*. However, it should be noted that in an effort to foster further public input on the Project, the City extended the required 45-day public review period for the Draft EIR to 65 days. Therefore, the City has complied with all CEQA requirements aimed at enhancing public participation.

#### **RESPONSE I-52-4**

This comment states that CEQA mandates the identification of significant effects, alternatives, and mitigation measures. The commenter further provides requirements under CEQA related to public review and comment on environmental documents.

Throughout Chapter 4.0 of the Draft EIR, potentially significant impacts of the Project are analyzed and identified and mitigation measures are prescribed, where determined necessary to reduce potentially significant impacts to a less than significant level. In addition, several Project alternatives are analyzed in Chapter 5.0, Alternatives, of the Draft EIR in an effort to identify the Environmentally Superior Alternative and the Preferred Alternative. As discussed in Response to Comment I-52-3, the City has also conducted several public meetings and has allowed for an extended review period for the public to comment on the Draft EIR for the Project. For these reasons, the City has evaluated the environmental impacts of the proposed Project consistent with the *State CEQA Guidelines*.

#### **RESPONSE I-52-5**

This comment indicates that failure to comply with CEQA and provide full disclosure of information would leave the project proponent open to possible lawsuits. Please refer to Response to Comment I-52.

#### **RESPONSE I-52-6**

This comment raises concern that the proposed Project would not provide equal access to pool facilities for all City residents. The commenter makes specific reference to the provisions of Title VI of the Civil Rights Act of 1964.

A large majority of the funding for the proposed Project would originate from Tidelands funds, which are legally mandated to fund development within the City's Tidelands area. Therefore, developing the proposed Project at an alternative location in the City outside of the Tidelands area with Tidelands funds would be expressly prohibited. Due to the cost of the Project, developing the Project outside of the Tidelands area without the Tidelands funds would also be infeasible due to a lack of funding sources. Furthermore, the primary objective of the Project is to replace the former facility in its original location. It should also be noted that the proposed

Project was initiated prior to the demolition and removal of the old facility, as it has long been the City's intention to replace the old facility on the same site. However, the City has been engaged in group discussions conducted by the Tidelands Capital Improvements Project group, separate from the proposed Project, about potentially providing bus service to the beach and surrounding locales in an effort to provided increased access to the coastal zone.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 22, 2016 1:35 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: New Belmont Plaza Pool

**From:** Lynne Cox [<mailto:lynnecox@aol.com>]  
**Sent:** Thursday, June 16, 2016 4:14 PM  
**To:** Craig Chalfant  
**Subject:** New Belmont Plaza Pool

June 16, 2016

Dear Mr. Chalfant:

I am writing to express strong support of full development of the Belmont Plaza Pool. Recreating a world-class aquatic facility is more than just a benefit to the community, it is a requirement if we consider ourselves the "Aquatic Capital of the World" and we seek the distinction of attracting high-profile athletic events to our community. At the core of the project, of course, is the recreational and fitness benefits offered to community residents of all ages. | I-53-1

There are several vital points to consider. While current plans call for a total of 1,250 seats in the indoor component, a minimum of 1,500 seats is required to host NCAA events and world-class competitions. I urge you to support construction of the higher seating capacity. | I-53-2

Including an indoor diving component is essential for hosting national and international competitions. We must also consider the realities of capital and operational costs – and including the indoor diving structure optimizes these critical items. Let's make this right and build what is truly needed and can be operated efficiently. | I-53-3

The old Belmont Plaza Pool was my first home in the water. I first swam there as a teenager with some of the best swimmers in the world. I feel that the pool was where I truly recognized my potential as a world-class athlete, and I went on to break world records swimming across the English Channel, the Catalina Channel, the Bering Strait between the United States and the Soviet Union, in Antarctic waters, and many other exciting and challenging locations. My roots have always remained here in Long Beach and I believe that the new Belmont Plaza Pool is an essential asset for our community. I urge you to strongly support building the new pool with these necessary considerations in mind. | I-53-4

I would be very happy to be a spokesperson for this project on behalf of the athletes, families, and youth of our community. More information regarding my background can be found at [www.lynnecox.com](http://www.lynnecox.com).

Thank you very much.

Lynne Cox  
 Author - Speaker - Athlete  
 65 61st Place  
 Long Beach, CA 90803  
 562-505-4112  
[www.lynnecox.com](http://www.lynnecox.com)

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**LYNNE COX**  
**LETTER CODE: I-53**

**DATE: June 16, 2016**

**RESPONSE I-53-1**

This comment expresses support for the proposed Project.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-53-2**

This comment suggests an increase in the proposed seating capacity from 1,250 spectators to 1,500 spectators.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-53-3**

This comment notes the essential nature of an indoor diving component for large aquatic events.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

**RESPONSE I-53-4**

This comment is conclusory in nature and provides background information about the commenter's experiences at the former Belmont Pool.

This comment does not contain any substantive comments or questions about the Draft EIR or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Wednesday, June 22, 2016 12:54 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: EIR Belmont Pool

-----Original Message-----

From: John McMullen [<mailto:mcmullenjohnw@gmail.com>]  
Sent: Friday, June 17, 2016 10:22 AM  
To: Craig Chalfant  
Subject: EIR Belmont Pool

Dear Mr. Chalfant,

As a member of the citizen's stakeholder group which helped to provide community input for the Belmont Pool project I would like to commend you and our City government for providing oversight and support for this important facility.

I-54-1

I have reviewed the EIR and have three significant areas of concern:

1. 1250 indoor spectator seats is not a sufficient number to attract top level US national swimming and diving events to Long Beach. 1500 seats should be a minimum. Even local high school/collegiate and regional events need at least 1500 seats. Long Beach has long been recognized for its history of aquatic events and the Belmont Pool was a centerpiece. The new facility can renew that focus and bring economic and lifestyle positives to our community.

I-54-2

2. In keeping with the above theme, an indoor diving well is mandatory.

I-54-3

3. I question an expanded parking requirement for events when there already exists plenty of parking in the lots adjacent to Ocean on the beach side. These lots are typically under-utilized most of the time.

I-54-4

Thank you for considering my comments,

Best regards,  
John

John W McMullen  
562.400.6736  
[mcmullenjohnw@gmail.com](mailto:mcmullenjohnw@gmail.com) | via iPad

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**JOHN W. MCMULLEN**  
**LETTER CODE: I-54**

**DATE: June 17, 2016**

**RESPONSE I-54-1**

This comment is introductory in nature and does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-54-2**

This comment expresses concern that the proposed seating capacity of the proposed Project is not sufficient, and suggests an increase in the seating capacity to 1,500 spectators.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-54-3**

This comment states that the indoor diving well is mandatory.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

**RESPONSE I-54-4**

This comment questions the proposed parking mitigation for large events and states that sufficient parking exists in the parking lots in the vicinity of the Project site.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Monday, June 06, 2016 11:17 AM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Long Beach Aquatic Facilit

---

**From:** [Robstees@comcast.net](mailto:Robstees@comcast.net) [<mailto:Robstees@comcast.net>]  
**Sent:** Monday, June 06, 2016 11:14 AM  
**To:** Craig Chalfant  
**Subject:** Long Beach Aquatic Facilit

Mr. Chalfant,  
I read the alternative plans for your new aquatic facility and was startled by the alternative 3 option to build the diving facility outside. If you do that, you will greatly reduce the possibility of your community to host major diving events and decrease the effectiveness of being able to attract and produce world class divers. Swimmers, water polo players and synchronized swimmers can train and compete effectively in cool and windy weather, divers cannot. I realize there are no other indoor diving facilities in California, that I am aware of, but that is the beauty of building your facility indoors. It puts you miles above the other facilities for usefulness and effectiveness in hosting events.

I-55-1

I hope those responsible make the right decision for the city of Long Beach and build an indoor diving facility. If you have any questions please feel free to contact me at this email address or phone at (305) 393-0142.  
Sincerely,  
Dr. Ron O'Brien  
USA Olympic Diving Coach  
1968-72-76-80-84-88-92-96

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**RON O'BRIEN**  
**LETTER CODE: I-55**

**DATE: June 06, 2016**

**RESPONSE I-55-1**

This comment expresses concern related to the placement of the diving platform and well outdoors, as proposed under Alternative 3. The commenter opines that changing weather conditions and strong winds would render an outdoor diving platform and well an inappropriate option for divers utilizing the proposed Project. This comment further opines that an indoor dive tower would be unique to the State and would attract more visitors and events to the Project. As such, the commenter recommends that the indoor diving towers are essential to the proposed Project and should not be eliminated.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

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**From:** Carol Hansen <chansen@ovsd.org>  
**Sent:** Tuesday, June 14, 2016 7:59 PM  
**To:** Craig Chalfant  
**Cc:** Keith Hansen; lucyjohnson1@gmail.com  
**Subject:** Comments on Draft EIR Belmont Pool

June 14, 2016

FROM: Carol Lind  
Hansen 7201  
North Marina Pacifica  
Drive Long Beach, CA  
90803

TO: Craig Chalfant, Senior Planner City of Long  
Beach Development Services/Planning  
Bureau 333 West Ocean Blvd., 5<sup>th</sup>  
Floor Long Beach, CA 90802

Dear Mr. Chalfant:

I was born and raised in Long Beach and learned to swim in the original Belmont Plaza Olympic Pool. My family has a long history of participating in and support aquatics in the City of Long Beach. In my youth I competed on swim teams with local clubs, Wilson High School and CSULB, and later served as a teacher and swim coach at Wilson High School. The rebuilding of our iconic Long Beach pool is important to Long Beach. I am pleased with the design and functionality of the project. The facility will be the jewel of the Long Beach coastline. The new plans call for 1250 indoor seats, which is not adequate for major competitions. We must have a facility for national championships, international competitions, major college and CIF competitions that hold at least 1500 seats for spectators and athletes. The original Belmont Plaza Olympic Pool had over 2000 seats.

I-56-1  
I-56-2

Equally important are the inclusion of diving towers. Diving towers are essential, allowing the full spectrum of aquatic competitions to be held in our city's world class aquatic center. Furthermore, very few venues in southern California accommodate both swimming and diving competitions. Long Beach has the opportunity to create a competition pool and diving arena, allowing our City to be the provider of a much needed diverse and functional aquatic facility in California.

I-56-3

I am very concerned about the proposed mitigation measure (Table 7.A, 4.12.1) for traffic and parking, specifically parking. Requiring an Event Traffic Management Plan when expected attendance at larger events exceeds 450 spectators is unnecessary. There are over 1,000 parking spaces in the two parking lots adjacent to the project. The former Belmont Plaza Olympic Pool 2,000 seat capacity facility routinely had over 450 spectators with no requirement for a traffic management plan. I have attended and participated in numerous events at Belmont Plaza Olympic Pool since it opened in 1968 and in my experience those events never filled the parking lots, nor were there traffic issues. Is such a requirement a means for the City to charge additional fees to event organizers?

I-56-4

My hope is for a facility that will support our diverse aquatic activities and uphold Long Beach's fine reputation as an aquatic destination for athletes from around the world. Thank you for considering my opinions.

I-56-5

Sincerely,

Carol Hansen

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**CAROL HANSEN**  
**LETTER CODE: I-56**

**DATE: June 14, 2016**

**RESPONSE I-56-1**

This comment is introductory in nature and expresses overall support for the proposed Project. This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-56-2**

This comment expresses concern that the proposed seating capacity of the proposed Project is not sufficient, and suggests an increase in the seating capacity to 1,500 spectators.

Refer to Common Response 1 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to the permanent seating capacity provided by the proposed Project.

**RESPONSE I-56-3**

This comment states that the diving tower is essential to the Project.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

**RESPONSE I-56-4**

This comment questions the proposed parking mitigation for large events and states that sufficient parking exists in the parking lots in the vicinity of the Project site.

Refer to Common Response 3 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to parking and the proposed mitigation measure requiring an Event Traffic Management Plan.

**RESPONSE I-56-45**

This comment expresses support for the proposed Project and thanks the City for considering the commenter's opinions.

This comment does not contain any substantive comments or questions about the Draft Environmental Impact Report (EIR) or analysis therein. This comment will be forwarded to the decision-makers for their review and consideration. No further response is necessary.

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**Alyssa Helper**

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**From:** Craig Chalfant <Craig.Chalfant@longbeach.gov>  
**Sent:** Tuesday, June 14, 2016 1:46 PM  
**To:** Ashley Davis; Alyssa Helper  
**Cc:** Dino D'Emilia  
**Subject:** FW: Belmont Pool EIR issues

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**From:** Erica [<mailto:therobinett6@gmail.com>]  
**Sent:** Tuesday, June 14, 2016 11:02 AM  
**To:** Craig Chalfant  
**Subject:** Re: Belmont Pool EIR issues

Thank you for your time and response. It is appreciated!

At the risk of belaboring the point - I think it important to emphasize health and safety issues surrounding a potential outdoor move of the dive well - the fact is sand blowing and ocean glare/reflection of the sun in the face of divers performing dangerous skills AND beginning divers in training, are real factors in having an outdoor dive well on the beach. This will cause a notable and significant risk to diving board and platform users. This human concern must be balanced with the environmental impact. Thank you again.

Erica Robinett  
 Sent from my iPhone

On Jun 14, 2016, at 10:32 AM, Craig Chalfant <[Craig.Chalfant@longbeach.gov](mailto:Craig.Chalfant@longbeach.gov)> wrote:

Thank you for your interest in the Belmont Pool project. Your comments will be included in the Final EIR along with all other comments received during the Draft EIR public comment period.

Please contact me with any questions or concerns regarding this project.

---

**From:** Erica Robinett [<mailto:therobinett6@gmail.com>]  
**Sent:** Monday, June 13, 2016 5:32 PM  
**To:** Craig Chalfant  
**Subject:** Belmont Pool EIR issues

Craig Chalfant  
Senior Planner  
City of Long Beach  
Development Services/Planning Bureau  
333 West Ocean Boulevard, 5th Floor  
Long Beach, California 90802  
Phone: (562) 570-6368  
Email: [craig.chalfant@longbeach.gov](mailto:craig.chalfant@longbeach.gov)

Attachment 1

Dear Mr. Chalfant,

As a long time resident of Long Beach, California, I would like to address the current Belmont Pool project and EIR issues currently on your desk relating to the location of the DIVE WELL and SEATING.

Importantly, the rebuild of the pool should allow for the appropriate DIVE WELL within the INDOOR facility (not outdoors) AND allow for the appropriate number of SEATS for major national and international aquatic events in DIVING, WATER POLO, and SWIMMING!

As you may know, the facility once held Olympic trials, NCAA championships, and was a place where many youth were inspired to pursue their athletic dreams. It was a place people of all ages enjoyed safe and health recreational activity. Our community is now looking forward to rebuild and continue an important legacy.

To do this the DIVE WELL must be built in the INDOOR facility AND allow for the appropriate number for SEATS for major national and international aquatic events.

It is my understanding that the LB CITY COUNCIL already voted UNANIMOUSLY twice to have an INDOOR DIVE WELL.

An outdoor dive well is unacceptable because of some of the following reasons:

1- SAFETY AND COST - moving it outdoor may cause many problems such as safety of divers due to potential ocean and sun glare and additional significant building costs related to lighting, seating, cleaning, and maintenance.

2-LIMIT ABILITY TO HOST MAJOR EVENTS/LIMITED USE - outdoor placement would potentially limit the seating and limit the new facility's ability to host major events for diving. This undermines the overall best use of the facility.

3-RARE COMMODITY for DIVING COMMUNITY - a diving well, proper boards, and the platform is very important to the diving community. Unlike other aquatic sports which require the pool, diving requires the tower, boards, and the pool so as to practice, train and compete. This is a RARE commodity for Long Beach to have. There are very few facilities in all of Southern California that have the equipment to train all year round and seating for holding competitions. This is essential part of the project to be able to have this type of indoor facility here in Long Beach.

As for SEATING and PARKING - All the aquatic sports need a minimum of 1500 seats to make the use of the facility acceptable. The parking area which already has over 1000 spots must be considered. This new facility has the opportunity to be a phenomenal addition to the United States presence



in aquatic athletics. It has a CHANCE to be a FINA (International governing body of diving, water polo, and swimming) regulation aquatic facility in CALIFORNIA and having the seating to accommodate this is very valuable.

This project can once again be a place for recreational activities, training, and once again host competitive events for all aquatic sports from beginner level, to high school, college, national, international, and Olympic levels.

This project is important locally for our town, but also important for Los Angeles County, the State of California, nationally, and internationally.

Thank you for your time and consideration.

Yours,  
Erica Robinett  
Long Beach, California



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**ERICA ROBINETT**  
**LETTER CODE: I-57**

**DATE: June 14, 2016**

**RESPONSE I-57-1**

This comment expresses concern related to the outdoor diving well, as proposed under Alternative 3. Specifically, the commenter cites health and safety concerns due to wind, sun, and other weather conditions.

Refer to Common Response 2 in Section 2.1, Frequent Comments and Common Responses, of this Final EIR for further discussion related to Alternative 3 included in the Draft EIR, which includes an outdoor diving well component.

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### 3.0 ERRATA

This section of the Final Environmental Impact Report (EIR) provides changes to the Draft EIR that have been made to clarify, correct, or add to the environmental impact analysis for the proposed Belmont Pool Revitalization project (proposed Project). Such changes are a result of further review of the Draft EIR. The changes described in this section are generally minor changes that do not constitute significant new information that alter the outcome of the environmental analysis or require recirculation of the document (*State California Environmental Quality Act [State CEQA] Guidelines* Section 15088.5).

Such changes to the Draft EIR are indicated in this section under the appropriate Draft EIR section. With the exception of changes to tables and figures, deletions are shown with ~~strike through~~ and additions are shown with underline.

- 1) Throughout the Draft EIR, the indoor and outdoor pools are referred to as “competitive pools.” The word “competitive” has been removed from the following pages to clarify that these pools are not exclusively for competitive use, but are also for recreational use by the general public: Page 1-1, Page 3-25, Pages 3-35 and 3-36, Page 3-39, Page 4.9-5, Page 4.9-24, Pages 4.11-5 through 4.11-7, and Page 5-24.
- 2) Throughout the Draft EIR, the building height is described as being 71 ft throughout the Draft EIR. While the building height will be 71 ft, this height is in reference to the plinth, which itself is located 7 ft above existing grade. As such, the total height of the building above the existing grade would be 78 ft at its apex (refer to Figure 4.7.1, North Elevation Comparison, in Section 4.1, Aesthetics, of the Draft EIR).
- 3) The following subsections have been renumbered, as subsection “3.4.5” has been skipped in Chapter 3.0, Project Descriptions, causing the subsections to move directly from “3.4.3” to “3.4.6”: Subsection 3.4.~~65~~, Operational Characteristics; 3.4.~~76~~, Passive Park/Landscaping; 3.4.~~87~~, Proposed Pedestrian Access and Parking; 3.4.~~98~~, Signage; 3.4.~~109~~, Utilities and Public Services; and 3.4.~~110~~, Conservation and Sustainability Features.
- 4) The last sentence on Page 4.1-4 of Section 4.1, Aesthetics, of the Draft EIR has been revised as follows:

An approximately six ft concrete wall lines the southern side ~~the western side~~ of Ocean Boulevard, impairing much of the public view of the Pacific Ocean from this area.

- 5) Page 4.10-16 of Section 4.10, Noise, of the Draft EIR has been revised as follows:

*Crowd noise was measured to be 65 dBA  $L_{eq}$  at 75 ft. It is anticipated that reference noise level measurements obtained from RECON at the high school championship*

*football game would be similar to ~~typical daily events or special events~~ using the PA system at the proposed Project.*

- 6) Page 4.11-2 of Section 4.11, Recreation, of the Draft EIR has been revised as follows:

*In addition to the aquatic operations at the Project, the City's Department of Parks, Recreation, and Marine own and operate three additional Public Pool facilities (with the exception of the pool formerly known as the Will Reid Scout Pool, which is owned by Integral Communities).*

- 7) Page 4.13-7 has been revised to reflect the most current information provided by Los Angeles County Sanitation District (LACSD) in regard to wastewater facilities. These changes correct the average flow of the Joint Water Pollution Control Plant (JWPCP), the District in which the project site is located within LACSD's jurisdiction, and the most current year in which the design capacity and conveyed peak flow were measured at the Joint Outfall C Unit Trunk Sewer were measured. These revisions are as follows:

**Wastewater.** The LBWD operates and maintains nearly 765 mi of sanitary sewer lines and delivers over 40 million gallons per day (mgd) of wastewater to LACSD facilities located on the north and south sides of the City. Currently, a majority of the City's wastewater is delivered to the JWPCP of LACSD. The remaining portion of the City's wastewater is delivered to the Long Beach Water Reclamation Plant of LACSD. The JWPCP is located at 24501 S. Figueroa Street in the City of Carson and has a design capacity of 400 mgd, and currently processes an average flow of ~~280~~ 258.4 mgd.

The LACSD owns, operates, and maintains the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. The proposed Project is located within the jurisdictional boundaries of LACSD District ~~293~~. LACSD owns, operates, and maintains approximately 1,400 mi of sewers, ranging from 8 to 144 inches in diameter that convey approximately 500 mgd of wastewater to 11 wastewater treatment plants. Included in LACSD's wastewater collection system are 48 active pumping plants located throughout the County of Los Angeles (County).

As noted in the comment letter (May 6, 2014) received by the LACSD, wastewater flow originating from the existing Project site discharges to a local sewer line, which is not maintained by the LACSD. Subsequently, wastewater in this sewer line is conveyed to either the LACSD's Anaheim Street Trunk Sewer located in 11<sup>th</sup> Street at Orange Avenue or the LACSD's Joint Outfall C Unit Trunk Sewer, located in 11<sup>th</sup> Street at Belmont Avenue. The 36-inch diameter Anaheim Street Trunk Sewer has a design capacity of 19.7 mgd and conveyed a peak flow of 5.7 mgd when last measured in 2012. The 51-inch diameter Joint Outfall C Unit Trunk Sewer has a design capacity of 29.2 mgd and conveyed a peak flow of 12.2 mgd, when last measured in 201~~2~~3.

- 8) Page 4.13-24 has been revised to reflect the most current information provided by LACSD in regard to wastewater facilities. This change corrects the most current year in which the design capacity and conveyed peak flow were measured at the Joint Outfall C Unit Trunk Sewer. This page has been revised as follows:

As described above, wastewater originating at the Project site is conveyed by City sewer lines to either the LACSD's Anaheim Street Trunk Sewer located in 11<sup>th</sup> Street at Orange Avenue or the LACSD's Joint Outfall C Unit Trunk Sewer, located in 11<sup>th</sup> Street at Belmont Avenue. The 36-inch diameter Anaheim Street Trunk Sewer has a design capacity of 19.7 mgd and conveyed a peak flow of 5.7 mgd when last measured in 2012. The 51-inch diameter Joint Outfall C Unit Trunk Sewer has a design capacity of 29.2 mgd and conveyed a peak flow of 12.2 mgd, when last measured in 2012~~3~~. The anticipated increase in daily wastewater flow from the proposed Project would require approximately 0.33 percent of the existing available design capacity of the Anaheim Street Trunk Sewer and 0.27 percent of the existing available design capacity Joint Outfall C Unit Trunk Sewer. Therefore, both trunk sewers would have sufficient capacity to accommodate anticipated wastewater flows from the proposed Project.

**Wastewater Treatment.** According to LACSD, it is anticipated that wastewater from the Project site would be treated at the JWPCP located in the City of Carson, which has a design capacity of 400 mgd and currently treats on average a wastewater flow of 280~~58.4~~ mgd. The anticipated increase in daily wastewater flow that would result from Project implementation would represent 0.06 percent of the anticipated available daily capacity of the JWPCP. Therefore, the anticipated increase in daily wastewater flow from the proposed Project could be accommodated within the existing design capacity of the JWPCP. The proposed Project would not substantially or incrementally exceed the current or future scheduled capacity of the JWPCP by generating flows greater than those anticipated.

- 9) Page 4.13-33 has been revised to include the most current information provided by LACSD in regard to how the District calculates current and projected wastewater demands. This page has been revised as follows:

**Wastewater.** The geographic area for the cumulative analysis for wastewater treatment is defined as the City and the LACSD service territory. Within its service area, LACSD uses United States Census Bureau and California Department of Finance population information and actual flowrates to estimate the per capita generation of sewage. ~~with~~ Population projections from SCAG and estimated per capita generation of sewage are then used as well as current land use and build-out or zoned land use to project current and future wastewater flows. Because LACSD projects that its existing and planned wastewater treatment capacity would be sufficient to accommodate the growth forecasted by SCAG the United States Census within its service area, development that is generally consistent with this forecast can be adequately served by LACSD facilities. The proposed Project would replace and improve the previous Belmont Pool Facilities; no change in land use is proposed. LACSD existing facilities have the capacity to accommodate past, present, and reasonably foreseeable projects. Furthermore, LACSD routinely monitors the capacity of its existing facilities relative to project needs, and capacity projects are undertaken on an as-needed basis to meet wastewater demands associated with population projections. The proposed Project would not contribute wastewater that would exceed the service capacity of LACSD. Therefore, the proposed Project would not significantly contribute to or cause cumulative impacts to wastewater services, and no mitigation is required.

- 10) Page 4.5-9 of Section 4.5, Geology and Soils, of the Draft EIR, has been revised as follows:

Since the site is located approximately 1.5 miles ~~southwest-northeast~~ of the Newport-Inglewood Structural Zone, significant ground shaking or secondary seismic ground deformation effects could occur at the site should a major seismic event occur along the Newport-Inglewood Structural Zone.

- 11) Page 4.5-5 of Section 4.6, Global Climate Change, of the Draft EIR, has been revised as follows:

“The City adopted the Long Beach Sustainable City Action Plan on February 2, 2010 ~~2019~~.” (Page 4.6-19).

- 12) Page 5-23 of Chapter 5.0, Alternatives, has been revised as follows:

However, because Alternative 3 would relocate the diving well to the outdoor pool component, space constraints would require the ~~consolidation of pools and~~ removal of the divers’ whirlpool and the loss of an indoor competitive diving facility.

- 13) Pages 5-35 and 5-36 of Chapter 5.0, Alternatives, have been revised as follows:

“Although Alternative 5 would redevelop and replace the former Belmont Pool with a more modern facility that better meets the needs of recreational and competitive swimmers, divers, and aquatic sports participants; (Objectives 1, and 2), ~~and increases programmable water space to minimize scheduling conflicts (Objective 5)~~, it does not meet these objectives to the same degree as the proposed Project. Alternative 5 provides only 200 sf more pool area than the former Belmont Pool facility, and is 49 percent less pool area than the proposed Project. The small increase in pool area would not alleviate the overcrowding and schedule conflicts of the former Belmont Pool as compared to the proposed Project (Objective 5).”