



May 16th, 2017

Honorable Mayor and Fellow Councilmembers,

I regret that external circumstances prevent me from attending tonight's meeting and having the opportunity to vote. As the only other Councilmember whose district has access to Tidelands funds, I do not take this decision lightly. I have a number of serious concerns about the planning process up to this point, the BBAC's compliance with local and statewide (Coastal Commission) regulations, and the project's future impacts on our environment. Given the information provided to me, it is clear that as a City we have not met the standards required under CEQA to certify this EIR; as a result, had I been able to be with you all tonight, I would be in support of the appeals to the Planning Commission's decision. My concerns are as follows:

- To my knowledge, the EIR did not identify and analyze compliance with Coastal Act policies such as "protective devices" as outlined in 30253. In the letter from the Coastal Commission, they stated that the structure itself could act as a seawall or protective device. This point should have been part of the analysis in the original EIR document and given the opportunity to be circulated for discussion.
- The current Wave Uprush Study (2014) does not account for the updated sea-level rise projections which were released last month. Furthermore, the study states that under a worst case scenario in 2100 conditions, much of Belmont Shore and the Peninsula would be inundated as well, but does not discuss how the fixed structure could exacerbate this by permanently inundating our coastline.
- Having reviewed the EIR, I do not believe enough evidence was provided to reject the "Elephant Lot" as a feasible alternative. I understand that there is a private lease (expires in 2030) for an annual convention that takes place three days per year, however a more in-depth analysis of this lot (e.g. parking mitigation efforts, study of the highest and best use of the lot, eminent domain) should have been done before it was entirely ruled out, particularly considering the serious environmental concerns and extremely high costs associated with the beach location.

In sum, I believe it is our responsibility to ensure that our public dollars are spent wisely for the collective good of Long Beach. I have concerns about building a \$103 million pool facility on unstable sand in an area subject to SLR and erosion when we could be building this project for significantly less money in an alternative location. Both the savings and Tidelands dollars that will no longer be tied up as a result of the unfunded BBAC should go towards doing everything in our power to adapt to the very same sea-level rise which threatens this facility.

Respectfully Submitted,

Councilmember Jeannine Pearce, 2nd District