

From: Melinda Cotton [REDACTED]
Sent: Thursday, December 02, 2021 12:05 PM
To: CSLC CommissionMeetings
Cc: Moser, Michaela@SLC; Boggiano, Reid@SLC; Auditor@longbeach.gov
Subject: Audit and Reaccess 'Queen Mary' Item # 72, State Lands Commission Agenda Dec. 8, 2021 \$5,000,000 Tidelands Oil Money expenditure on Queen Mary by City of Long Beach
Attachments: LB Auditor Queen Mary Report Press Release 11-14-21.pdf; SLC-Boggiano Letter re Queen Mary 9_14_21 .pdf; SLS #72 Queen Mary Tidelands expenditure 12-08-21_72.pdf

Attention: This email originated from outside of SLC and should be treated with extra caution.

Chair Eleni Kounalakis and Commissioners,

Before voting December 8th, Please consider that KABC television news in June 2021 stated: (KABC) -- "**The historic Queen Mary in Long Beach is falling apart, and it is going to take hundreds of millions of dollars in repairs as part of a complete makeover need for the ship to survive.**"

CBS News warned: "**Marine Survey Warns Queen Mary Is Falling Apart, Desperately Needs Repairs Or Could Sink**"

LA Times reported: "**Queen Mary could capsize without urgent repairs, report shows**"

(see web links below)

The question before you on December 8th is: Should state Tidelands Funds be used to rescue a failing tourist attraction - the Queen Mary - which has been touted as a City of Long Beach as an entity "...synonymous with the city's identity", according to the Long Beach Press Telegram.

Before allowing the City of Long Beach to spend \$5 million in limited **state** Tidelands Fund on the Queen Mary, we ask that you require an SLC Audit of the use of Tidelands Funds by the City of Long Beach - and it should follow up (as SLC Staff Requested) on the City's plan to turn over the Queen Mary and Pier H to the Port of Long Beach. *(please read SLC Staff letters sent to the City in June and on Sept. 14, 2021 questioning this turnover)*

The City in November 2017 approved spending what it called \$23 million in Bond and Tideland Funds for urgent repairs to the Queen Mary - but the ship's then leaseholder Urban Commons didn't use the money that way (according to City Auditor Laura Doud's recent report (*attached*) and the City didn't properly monitor the expenditures - and so your State Lands Commission is being asked to approve \$5 million in Tidelands Funds to do some of the job. (Note that there are estimates of up to \$500 million to make the Queen Mary a truly viable operation.)

In observing what the City of Long Beach is funding with Tidelands Funds, and especially what they don't fund (for example a truly needed new, technically up-to-date Lifeguard Headquarters sufficient to handle the growing visitor use of the beach, and coastal waters + the upcoming 2028 Olympic Sailing Events off the Belmont Pier - just one example).

The City's yearly Budgets (2022) now fail to show clearly how much money is in these Tideland Funds (Capital Projects), what it is being used for, and especially how much they have 'predesignated' for the Belmont Beach and Aquatics Center. Whenever I ask, I am rebuffed and sent in circles. It looks to me like there is only \$65-70 million in the Tidelands Fund (capital projects) right now, and it looks to me like they have put \$53 million of that off limits - holding it aside for the BBAC - which when they finally get final construction plans will cost much more than \$100 million. Where that money will come from is unknown. And with Sea Level Rise and Climate Change and more, clearly precious state Tidelands Funds are needed elsewhere.

In regard to the Belmont Pier, State Lands previously authorized the City to use \$200,000 in Tideland Funds for a 'feasibility study' of the Belmont Pier. No engineering type feasibility study was ever done. Public Works Director Eric Lopez e-mailed me that indeed the 'feasibility study' authorized had not been done, but that the 2020 and 2021 "Visioning Meetings" held by an architecture group with no experience in building piers - was now considered the study State Lands authorized.

The Belmont Pier, as I mentioned, is to be use for LA28 Olympics Sailing - and the Pier needs to be in excellent condition, capable of handling this very large event - yet our Councilmember is still telling people only \$20 million is designated ... clearly the Pier project to be done properly will cost a great deal more than that.

Prior to allowing further Tideland Expenditures, shouldn't the State Lands Commission (possibly in conjunction with City Auditor Laura Doud) obtain from the City true accounting of how much is in these various Tidelands Funds? And how it is being allocated?

Sincerely,
Melinda Cotton
Belmont Shore resident of 38 years

<https://abc7.com/queen-mary-city-of-long-beach-repair-restoration/10802180/>



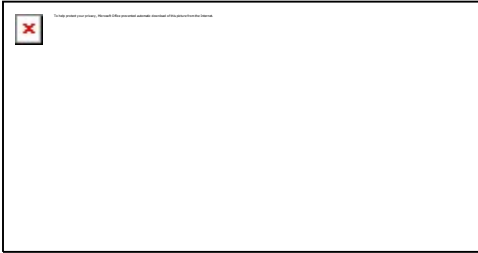
City of Long Beach takes over Queen Mary, gets started on repairs and restorations

The historic Queen Mary in Long Beach is falling apart, and it is going to take hundreds of millions of dollars in repairs as part of a complete makeover need for the ship to survive.

abc7.com

<https://losangeles.cbslocal.com/2017/03/13/marine-survey-warns-queen-mary-is-falling-apart-desperately-needs-repairs-or-could-sink/>

Queen Mary could capsize without urgent repairs, report shows



Queen Mary could capsize without urgent repairs, report shows - Los Angeles Times

Docked in Long Beach since 1967, the ship is a longtime tourist attraction, hotel and history buff destination that retains strong support from city leaders, including Garcia, who recently said it ...

www.latimes.com



PRESS RELEASE

November 15, 2021

Contact: Meghan King, Communications Manager, 562.570.6726, Meghan.King@longbeach.gov

For Immediate Release

Long Beach City Auditor's Report Finds the City Cannot Be Assured the \$23 million for Queen Mary Urgent & Critical Repairs Was Spent as Intended

Long Beach, CA – Long Beach City Auditor Laura Doud today released her [Queen Mary Report](#) to verify that Urban Commons, the previous leaseholder and operator of the Queen Mary, used the \$23 million as agreed upon to fund the 27 urgent and critical repair projects and to determine whether the City of Long Beach (City) provided sufficient oversight of the funds for these projects.

The Long Beach City Auditor's Office (Office) directed the forensics accounting firm, Hemming Morse, to perform an analysis of financial transactions and activity between Urban Commons and the City. Based on this analysis, the report includes the Office's conclusions and recommendations.

The key issues of the report were the following:

- Missing payment information;
- Excessive subcontractor markups and management fees;
- Items purchased were not for urgent and critical repair projects;
- Lack of vetting subcontractors and a competitive bidding process; and
- Lack of consistency regarding scopes of work and subcontractor invoices.

"We know the City paid more than necessary for some of the projects due in part to the excessive markups and management fee," said Long Beach City Auditor Laura Doud. "We cannot tell in detail how much or where all the repair money went due to a combination of missing payment information from Urban Commons and subcontractors and the lack of detail in subcontractors' vague invoices breaking down labor and material costs. We do know that only seven of the 27 repair projects were completed and that a lack of sufficient management oversight contributed to these problems. The City's funds were at risk, because the City used its own cash as well as City issued bonds for the \$23 million in upfront funds and ultimately ended up making the bond payment for \$2.4 million when it came due last year since revenues expected to fund this payment were not realized."

The report recommendations focus on how the City needs to ensure lease agreement terms and oversight are aligned with City policies and procedures.

"Moving forward the City needs to fully implement our recommendations to ensure that the issues detailed in this report are not repeated and that any future funds allocated for the Queen Mary are safeguarded and spent according to best practices," said Long Beach City Auditor Laura Doud.

The complete Long Beach City Auditor's Queen Mary Report can be viewed [here](#).

About the Long Beach City Auditor's Office

The Long Beach City Auditor's Office's mission is to make Long Beach better through independent audits and fraud investigations. The Office works to provide assurance City funds are spent as intended, promote transparency and accountability of City operations, and prevent fraud, waste and abuse of City resources. For more information visit CityAuditorLauraDoud.com and connect with the Office @LBCityAuditor on [Facebook](#), [Instagram](#) and [Twitter](#). Sign up to receive email [updates](#) and download the MyAuditor App at the [App Store](#) or [Google Play](#).

###

Background Information

The report highlights the following key issues:

Missing Payment Information:

Urban Commons and some subcontractors did not provide all necessary information to support that payments to subcontractors were made in the amounts or on the dates as asserted by Urban Commons. The City paid Urban Commons, however it could not be confirmed that Urban Commons passed all this money through to subcontractors. For example, two of the four largest subcontractors who worked on the repair projects did not respond with requested information, so it could not be confirmed they received payments.

Excessive Markups and Management Fee:

The lease agreement did not address markups or a management fee. The lease agreement did not include limits for acceptable markup percentages, what was eligible for markups, or when markups could be charged. There were instances where markups seemed excessive and where markups were compounded on each other causing the total amount billed to grow even larger. For example, a Fire & Life Safety Systems project invoice showed that the City paid an additional \$30,490.80 or 39% more for materials purchased after markups were compounded. Additionally, although it was not included in the lease agreement, the City approved a management fee for Urban Commons, which amounted to 5% on all subcontractor invoices totaling \$1.1 million. The value expected from this management fee was not defined or detailed.

Items Purchased Were Not for Urgent and Critical Repair Projects:

More than \$300,000 in payments were made by the City for visitor attraction items including a Tesla Coil, the Hollow Hallway, the Conjuring Video project equipment, and 18 Samsung tablets in the Ghosts & Legends project which was described as construction, demolition, and repair. The City reviewed and approved these visitor attraction items even though they were not in line with the intent of what the \$23 million designated for repair projects.

Lack of Vetting Subcontractors and a Competitive Bidding Process:

Subcontractors should have been vetted so that the City was aware of their qualifications, reasonable rates, and whether related party transactions existed. For example, it was determined that Dan Zaharoni, Urban Commons' Chief Development Officer, had relationships with two subcontractors who received \$285,000, and due to this it is possible that they were not the most qualified subcontractors and charged inappropriate amounts. Additionally, a competitive bidding process should have been used for subcontractors to ensure that the City received the most competitive, fair pricing and contract terms. Only one component of one of the 27 repair projects was found to have received multiple bids.

Lack of Consistency Regarding Scopes of Work and Subcontractor Invoices:

Scopes of Work (SOWs) submitted for the repair projects should have included details so that the contract, change orders, and invoices could all be compared to determine what was included and what was additional work. Some SOWs were vague, and it could not be determined if pricing was appropriate. For example, one SOW included a lump sum price without a breakdown of the costs related to labor and materials. Also, subcontractor invoices lacked sufficient detail making it difficult to verify whether the City received the materials and services for which it paid. A risk with this is that items may have been purchased and billed to the City that do not meet the lease agreement criteria. For example, one invoice had a total amount due per line item, such as \$125,000 for G&L Rust Inhibitor, however it did not show a breakdown of labor, material costs, or include backup such as receipts for materials or details of staff hours to complete the work.

**CALIFORNIA STATE LANDS
COMMISSION***Established in 1938***EXECUTIVE OFFICE**100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202**JENNIFER LUCCHESI**, Executive Officer**916.574.1800**TTY CA Relay Service: **711** or Phone **800.735.2922**
from Voice Phone **800.735.2929**
or for Spanish **800.855.3000**

September 14, 2021

Mr. Tom Modica
City Manager, City of Long Beach
411 West Ocean Blvd
Long Beach, CA 90802

Re: Agenda Item 24; File Item 21-0966: negotiations transferring Pier H and the Queen Mary to the Harbor Department.

Dear Mr. Modica,

The California State Lands Commission staff would like to re-submit its letter dated June 8, 2021, regarding a potential transfer of Pier H and the Queen Mary to the Harbor Department and attach these comments to Agenda Item 24. Commission staff would like to re-iterate its request that the City and the Harbor Department perform a thorough fiscal and management analysis of the potential impacts to future port operations before authorizing the proposed transfer. Any transfer must be consistent with the City's duty to perform its obligations under the tidelands grant impartially and for the sole benefit of the statewide public. (Pub. Resources Code, § 6009.1, subds. (c)(5)-(7).) Any final transfer agreement must reflect an arms-length negotiation and not self-dealing by the City.

The Staff Report states that additional costs may be incurred as negotiations may require some expertise to resolve issues, and those costs will be charged to the Tidelands Area Fund Group or require a transfer from the from the Tidelands Operational Fund Group. Staff is concerned that, to the extent the costs are incurred by the City rather than the Harbor District, they are not authorized expenditures under the City's tidelands grant.

As always, Commission staff stands ready to work with the City and the Harbor District to ensure the City's compliance with its fiduciary duty to the state of California.

Sincerely,

REID BOGGIANO

Granted Lands Program Manager

cc: Robert Garcia, Mayor, City of Long Beach
Members of the Long Beach City Council
Mario Cordero, Executive Director, Port of Long Beach

**CALIFORNIA STATE LANDS
COMMISSION**

100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202



Established in 1938

JENNIFER LUCCHESI, Executive Officer

916.574.1800

TTY CA Relay Service: **711** or Phone **800.735.2922**
from Voice Phone **800.735.2929**
or for Spanish **800.855.3000**

Contact Phone: 916.574.0450

June 8, 2021

File Ref.: G05-03

Mr. Tom Modica
City Manager
City of Long Beach
411 West Ocean Blvd.
Long Beach, California 90802
Tom.Modica@longbeach.gov

Subject: Potential Transfer of Control over Pier H to Harbor Department

Dear Mr. Modica:

Staff recently became aware that the City is considering transferring control over Pier H, including the Queen Mary, to the Harbor Department, which manages the Port of Long Beach (Port). During the City's April 6, 2021, City Council meeting, the Council discussed a request that the Harbor Commission consider accepting management and control over Pier H and directed the City Manager to provide information and documentation to the Harbor Department for review. The City Council asked the Harbor Commission to report back in 60 days. The California State Lands Commission staff requests that the City and the Port perform a thorough fiscal and management analysis of the potential impacts to future port operations before authorizing the proposed transfer. As a trustee of granted public trust lands, resources and assets, the City has a fiduciary duty to balance competing public trust needs and priorities and demonstrate that the proposed transfer would not impair the Port's management of the state's public trust lands and resources that are under its jurisdiction.

As you know, the City holds sovereign tide and submerged lands in trust to benefit all California citizens. Through the City's Charter, portions of these public trust lands are within the Port of Long Beach and are managed by the Long Beach Harbor Commission. Various other City departments manage the City's remaining public trust lands and assets.

Mr. Tom Modica

June 8, 2021

Page 2

Just like a private trust, the City, as trustee, must manage the state's lands, resources, assets, and revenues solely for trust purposes and purposes that have a statewide benefit--pursuant to both the common law Public Trust Doctrine and the trust grants. The City has the primary responsibility and authority to administer the trust on a day-to-day basis and to manage its granted public trust lands and assets for the benefit of all the people of California, including the duty to balance competing needs and priorities in the management of trust assets to further the goals of the trust.

The State Lands Commission has the statutory responsibility to oversee the management of sovereign public trust lands and assets by legislative grantees who manage these lands, in trust, on behalf of the state. The Commission and its staff exercise this responsibility and authority through various mechanisms, including through letter requests and collaboration with the trustee.

According to the April 6 staff report, the City believes that the transfer of the Queen Mary to the Harbor Department will result in more efficient management of Pier H and may help the Port meet its visitor-serving recreational goals, including those identified in its Port Master Plan. The staff report, however, lacks an analysis of the impact to the Port's operating budget as a result of the Queen Mary transfer. If Pier H is transferred from the City to the Harbor Department, the Port will incur the costs and responsibility to manage Pier H, including the Queen Mary, potentially impacting Port operations owing to the significant costs associated with the Queen Mary. Staff understands that operator mismanagement over the last several years has prevented urgent structural repairs from being completed, leaving the Queen Mary in need of at least \$41 million in critical repair work to address severe structural disrepair. Commission staff also understands that an additional \$23 million may be required for urgent safety repairs to keep the Queen Mary viable over the next two years.

The Harbor Commission recently approved a \$622.4 million budget for the Port, with more than half dedicated to capital improvement projects to support the Port's competitiveness, efficiency, and sustainability. According to the Port, it plans to invest almost \$1.6 billion in strategic projects over the next 10 years to enhance marine terminal productivity, enhance the efficiency of operations for customers, and improve operational sustainability. The Port has made significant progress, guided by its Green Port Policy, in reducing harmful air emissions, improving water quality, and implementing environmentally sustainable practices throughout the Port. Without a thorough review and analysis of the impact of the Queen Mary transfer to the Harbor Department, it is unclear

Mr. Tom Modica

June 8, 2021

Page 3

whether the Port will be able to meet its stated goals, including helping the region and state in its economic recovery and continuing to invest in its strategy to reduce the negative impacts of Port operations in an aggressive and comprehensive manner.

As described above, the City has a fiduciary duty to balance competing public trust needs and priorities and to carefully consider any potential financial and management impacts to the City's public trust lands and resources, including those currently managed by the Harbor Department. Commission staff requests that the City Council and the Harbor Commission thoroughly analyze the future financial liability of Pier H and the implications of the transfer on Port operations before approving the transfer of Pier H. Commission staff understands that there are many competing priorities the City is responsible for balancing as it manages the state's vast and diverse public trust lands, resources, and assets, especially in the current economic climate. Commission staff remains available to assist and support the City in conducting this thorough analysis to ensure its fiduciary responsibilities to the people of California are met.

Sincerely,



Reid Boggiano

Granted Lands Program Manager

Cc: (via email)

The Honorable Robert Garcia, Mayor, City of Long Beach

Mr. Mario Cordero, Executive Director, Port of Long Beach

Charles Parkin, City Attorney

The Honorable Stacy Mungo, Member, Long Beach City Council

The Honorable Suely Saro, Member, Long Beach City Council

The Honorable Roberto Uranga, Member, Long Beach City Council

The Honorable Al Austin, Member, Long Beach City Council

The Honorable Rex Richardson, Member, Long Beach City Council

The Honorable Daryl Supernaw, Member, Long Beach City Council

The Honorable Frank Colonna, President, Long Beach Harbor Commission

The Honorable Steven Neal, Vice President, Long Beach Harbor
Commission

Mr. Tom Modica

June 8, 2021

Page 4

The Honorable Bonnie Lowenthal, Long Beach Harbor Commission

The Honorable Bobby Olvera, Jr., Long Beach Harbor Commission

The Honorable Sharon Weissman, Long Beach Harbor Commission

Staff Report 72

PROPOSED ACTION

Review a proposed tideland oil revenue expenditure in an amount not to exceed \$5,000,000 by the City of Long Beach for one capital improvement project located on legislatively granted sovereign land in the City of Long Beach.

GRANTEE:

City of Long Beach

AREA, LAND TYPE, AND LOCATION:

Granted sovereign tide and submerged lands located in the city of Long Beach, Los Angeles County.

BACKGROUND:

The City of Long Beach (City) is a trustee of sovereign tide and submerged lands granted by the Legislature under Chapter 676, Statutes of 1911 and as amended; Chapter 102, Statutes of 1925 and as amended; and Chapter 158, Statutes of 1935. There have been many revisions to the statutes granting the City these lands. In 1964, the City's statutory trust grant was amended to authorize the City to spend tideland oil revenue for specific uses and to require the City to notify the Commission of proposed tideland oil expenditures (Chapter 138, Statutes of 1964, First Extraordinary Session).

Tideland oil revenue must be expended for uses and purposes consistent with the City's granting statutes and be for statewide purposes as opposed to purely local interests and benefits. The City is required to file a detailed description of any proposed capital improvement expenditure exceeding \$100,000 with the Commission 60 days before disbursement.

The proposed \$5,000,000 expenditure of tideland oil revenue is to fund one project located on the Long Beach tidelands as shown on Exhibit A. The project, as proposed and described by the City, is as follows:

1. QUEEN MARY DESIGN AND INFRASTRUCTURE

The City has leased the Queen Mary and adjacent facilities to seven different lessees over the last 40 years. Part of the lease agreements held the leaseholders responsible for the costs of operation, maintenance, and capital improvements of the ship. These expenses have been covered by the lessees from the revenue generated at the facility. The bankruptcy court approved the termination of the most recent lease as part of the lessee's bankruptcy proceedings and returned the responsibility for the Queen Mary to the City. The City has inspected, surveyed, and evaluated the condition of the Queen Mary and determined that approximately \$5 million in critical repairs are necessary for the health and safety of future occupants. The repairs that the City contends need immediate attention include:

- **Remove 22 Lifeboats.**

The lifeboats exert undue stress on their support system and the ship's structure. The project will abate lead-based paint (if present) within the lifeboats. 20 replica lifeboats will be removed and disposed of and two original lifeboats will be placed in storage at the ship for historical assessment.

- **Install 11 Bilge Pumps and an alarm system.**

The project includes installation of 11 bilge pumps and an alarm system. The pumps will activate automatically when water is present from firefighting activities or water intrusion due to a leak in the ship's hull. The alarm system will sound in case of water intrusion to warn the operator.

- **Install 5 Bulkheads.**

The project will extend the existing transverse steel walls that separate the ship into six separate watertight compartments. The bulkheads existed but were cut and modified to accommodate visitors. They will be partially rebuilt to contain water intrusion within separate compartments and prevent water from freely flowing to the adjacent compartments.

The City requests that the Commission review a \$5,000,000 expenditure for the aforementioned project.

PROPOSED EXPENDITURE: \$5,000,000

TOTAL ESTIMATED PROJECT COST: \$5,000,000

PRELIMINARY SCHEDULE:

Lifeboat Removal

- Design: Not applicable
- Bid: December 2021
- Demolition: February 2022
- Completion: Spring 2022

Install Pumps and Alarm System

- Design: December 2021
- Bid: January 2022
- Construction: Spring 2022
- Completion: Spring 2022

Bulkhead Repairs

- Design: December 2021
- Bid: January 2022
- Construction: Spring 2022
- Completion: Spring 2022

STAFF ANALYSIS AND RECOMMENDATION:

The City's statutory trust grant allows various uses of the oil revenue derived from the existing oil fields on the City's granted Public Trust lands.

Section 6(c) of Chapter 138, as amended, authorizes the expenditure of tideland revenues for the construction, repair, operation, and maintenance of bulkheads, piers, earthfills, streets, roadways, bridges, bridge approaches, buildings, structures, recreational facilities, landscaping, parking lots, and other improvements on or adjacent to the Long Beach tidelands or on, or adjacent to, the Alamitos Beach Park Lands.

Section 6(d) of Chapter 138, as amended, allows tideland revenue to be expended on construction, repair, operation, and maintenance of small boat harbors, marine stadiums, a maritime museum, marine parks, beaches, waterways, and related facilities on or adjacent to the Long Beach tidelands or on, or adjacent to, the Alamitos Beach Park Lands.

Based on the information provided by the City, the proposed capital improvement project appears consistent with the uses set forth in Sections 6(c) and (d) of Chapter 138, as amended by Chapter 941, Statutes of 1991. As required by the statutory trust grant, the proposed expenditure is for the benefit and use of the

statewide public and for uses and purposes not inconsistent with the City's statutory trust grant.

OTHER PERTINENT INFORMATION:

1. Pursuant to Chapter 138, Statutes of 1964, as amended by Chapter 941, Statutes of 1991 (Chapter 138), the Commission has 60 days to notify the City that a proposed capital improvement is not consistent with Chapter 138. Commission staff received notice from the City of the proposed expenditure on November 17, 2021.
2. The City's grant requires that it maintain separate tidelands accounts identified as the Harbor Fund, Tidelands Fund, and Tidelands Oil Revenue Fund. The proposed capital improvement project will be funded with tideland oil revenue from the Tidelands Fund.
3. In June 2021, staff sent a letter to the City regarding the potential transfer of Pier H and the Queen Mary to the Harbor Department. Staff understands that operator mismanagement over the last several years has prevented urgent structural repairs from being completed, leaving the Queen Mary in need of at least \$41 million in critical repair work. Staff is concerned the Port will incur the costs associated with the upkeep up the Queen Mary and requested the City perform a thorough fiscal and management analysis of the potential impacts to future Port operations before authorizing the transfer.
4. The proposed action is consistent with the "Meeting Evolving Public Trust Needs" Strategic Focus Area of the Commission's 2021- 2025 Strategic Plan.
5. Reviewing the proposed tideland oil revenue expenditure for consistency with Chapter 138 is not a project in accordance with the California Environmental Quality Act because it is an administrative action that will not result in direct or indirect physical changes to the environment.

Authority: Public Resources Code section 21065 and California Code of Regulations, title 14, section 15060, subdivision (c)(3).

EXHIBIT:

- A. Location and Site Map

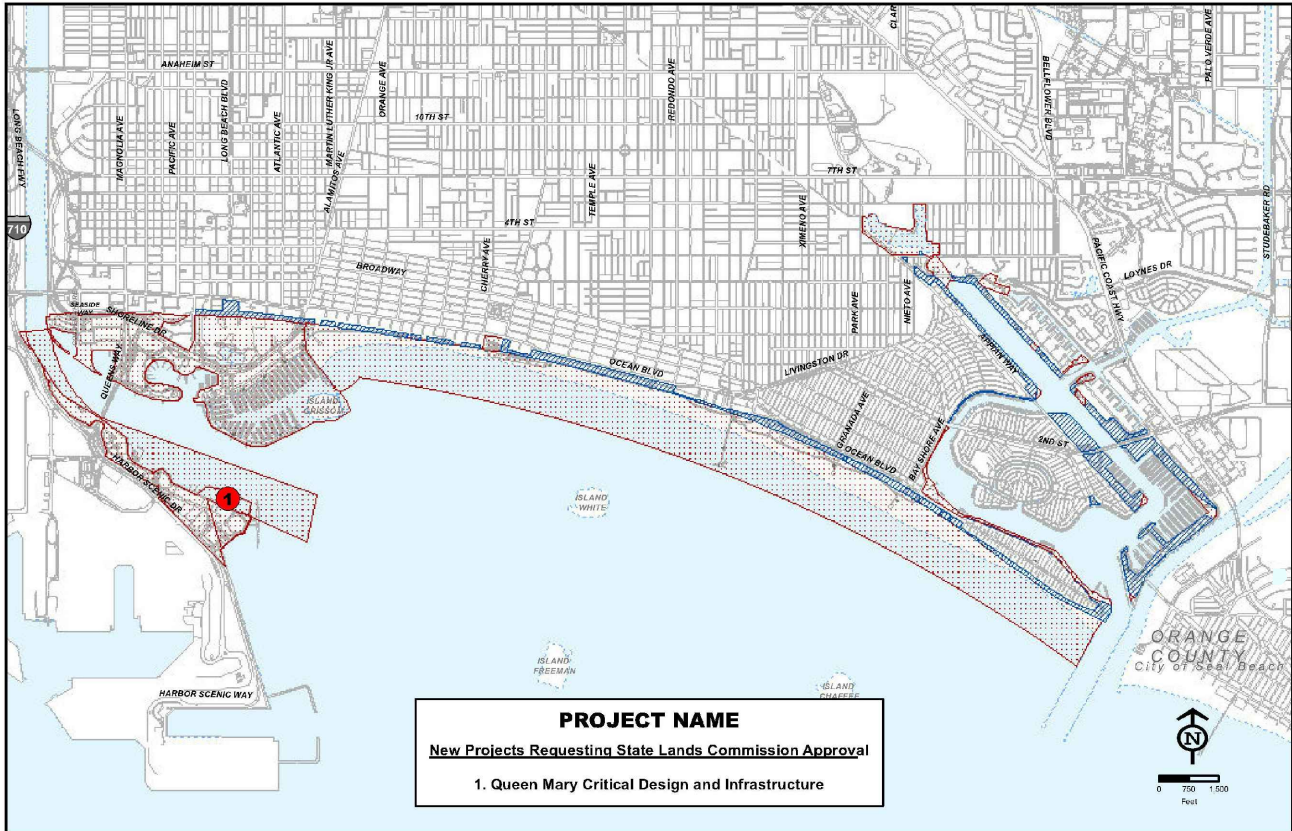
RECOMMENDED ACTION:

It is recommended that the Commission:

Find that, based on the information provided by the City, the proposed expenditure of tideland oil revenue in the amount of \$5,000,000 for one capital improvement project located on legislatively granted sovereign land in the City of Long Beach appears consistent with the uses set forth in sections 6(c) and (d) of Chapter 138, as amended.

NO SCALE

SITE



ATTACHMENT B
**CITY OF LONG BEACH
PROPOSED TIDELANDS CAPITAL PROJECTS**

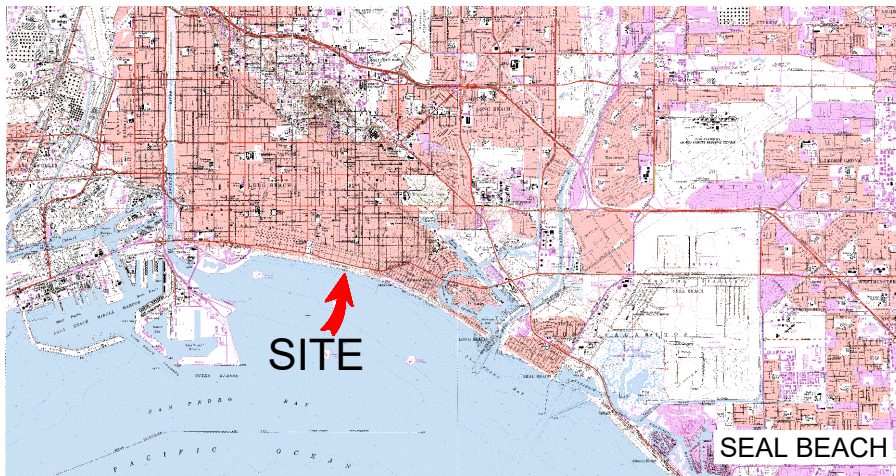
MAP FEATURES

- PROJECT LOCATION
- ▨ TIDELANDS
- ▨ CONTIGUOUS AREAS
- ▨ WATERWAY

LONG BEACH TIDELANDS

NO SCALE

LOCATION



MAP SOURCE: USGS QUAD

This Exhibit is solely for purposes of generally defining the lease premises, is based on unverified information provided by the Lessee or other parties and is not intended to be, nor shall it be construed as, a waiver or limitation of any State interest in the subject or any other property.

Exhibit A

CITY OF LONG BEACH
G 05-03
EXPENDITURE OF
OIL REVENUE
LOS ANGELES COUNTY



TS 11/17/2021