

## **H-8 LBACE Concern, Support, and Ask for 100 % Zero Emissions**

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Mayor and City Councilmembers of Long Beach,  
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**Re: Subsequent Environmental Impact Report (EIR-03-21 and PEIR-SCH# 2015051054) for the Climate Action and Adaptation Plan (CAAP)**

Thank you for the opportunity to provide written public comment on the Subsequent Environmental Impact Report (SEIR) for the Climate Action and Adaptation Plan (CAAP).

This letter follows up on correspondence this calendar year on the Draft SEIR on 5/02/2022 and the Planning Commission Hearing on 3/17/2022.

The first thing that should be stated about the SEIR, and the CAAP as it has developed since 2015, is that however flawed, incomplete, inadequate, or woefully under resourced, the City of Long Beach has long needed a workable framework for meeting greenhouse-gas emissions and pollution reduction generally, which the CAAP does attempt to do. Opinions may vary on how as of yet.

Second, the CAAP needs its Greenhouse Gas Inventorying and Monitoring updated to reflect 2022, and subsequent, years' realities. There is currently no way to evaluate our annual emissions or carbon-intensity load, or change therein, or which projects, recently completed or proposed prior to the formal adoption of this CAAP. No realistic way for neighborhoods, communities, business districts, or other sub-jurisdictions within the City of Long Beach, to plan out let alone achieve in place how to most effectively, equitably, expressly, completely, and affordably implement the entire trajectory of statutory emissions reduction targets through 2030, "net-zero" by 2045, and science-based targets of full decarbonization and zero emissions with the total phase-out of fossil fuel resource use before mid-century. Having a publicly accessible, transparent, and accountable CAAP implementation is essential to its success.

Third, emphasis should be placed on this plan being iterative – especially in light of the new developments and information available. Notably, I direct you to the recent work on demonstrating the technical feasibility of a quick and affordable transition to a 100% clean, renewable, zero-emissions economy in the United States lead by Prof. Mark Z. Jacobson.<sup>1</sup> This Monday, May 2nd, 2022, the State of California achieved nearly 100% of its electricity usage from renewable generation for over three hours.<sup>2</sup> It has been a telling feature of the City's approach to-date on developing the CAAP and the Feasibility Study on Community Choice Aggregation that not once has there been a public hearing, study session, or public presentation to the City Council, on how such a transition could proceed in Long Beach over the next 6 years, or what a complete phase-out of fossil fuel resource use can yet still look like.<sup>3</sup> Please do note this is coextensive with what is popularly understood worldwide to be our last best chance to avert climate catastrophe.<sup>4</sup> Yet not once has there been a public presentation of a total Solar potential Atlas, Renewable Generation Potential Atlas, or any other such studies the City has either commissioned, or had access to – including with new leases for offshore wind development in California State and Federal waters.<sup>5</sup>

Fourth, clearly how the CAAP continues to be developed, funded, and staffed at the City level will be important, but the level of actual public participation in adopting potential implementation actions, setting a clear order of logical priority for targets, engagement in programs as well as in iterating and improving upon them, There has, in part due to the pandemic, in part also due to intransigence of various City Departments, been a marked lack of public engagement, participation, or, frankly, input from public since 2017.

Fifth and final, with specific respect to proposed implementation actions AQ-5, BE-1, BE-2, BE-3, BE-4, BE-5, BE-6, BE-7, BE-8, T-1, and T-5 on to electrification of buildings, energy, and fleets, charging infrastructure, etc. – nothing in the current SEIR or CAAP precludes joining or creating a Community Choice Aggregation program or municipal electricity utility or other form of of the City of Long Beach asserting more control over electricity decisions within its land as well as waterway footprints. Any such program would be consistent with CEQA and the current SEIR. Please note that this is still an option for the City of Long Beach, especially for replacing oil and gas as structural revenue sources post-2030.<sup>6</sup> To provide just one example of the institutional innovation and responsiveness to economic recovery and environmental goals possible under CCAs, consider the example of Richmond already retrofitting some 20 old homes with solar and battery storage to operate as a virtual power plant – imagine how many pre-1970s housing units that could be made permanently affordable housing through similar programs, and then ask why such programs do not yet exist in your own Council District.<sup>7</sup>

ASK: That the Mayor and Long Beach City Council reconsider Community Choice Aggregation in light of new federal and state developments and opportunities within the next 120 days (before 12/10/2022).

Thanking You,  
Dave Shukla.

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- 1 See: <https://web.stanford.edu/group/efmh/jacobson/Articles/I/USStatesWWS.pdf>  
<https://web.stanford.edu/group/efmh/jacobson/Articles/I/CombiningRenew/WorldGridIntegration.pdf>  
<https://web.stanford.edu/group/efmh/jacobson/Articles/I/sad1109Jaco5p.indd.pdf>
  - 2 Cf. <https://www.desertsun.com/story/news/environment/2022/05/01/california-100-percent-powered-renewables-first-time/9609975002/>
  - 3 This author has attended, or attempted to attend, each and every single public meeting, Open House, hearing, etc., on the CAAP since 2017, including the limited number of community and business working group meetings in January 2019.
  - 4 See: [https://report.ipcc.ch/ar6wg3/pdf/IPCC\\_AR6\\_WGIII\\_FinalDraft\\_FullReport.pdf](https://report.ipcc.ch/ar6wg3/pdf/IPCC_AR6_WGIII_FinalDraft_FullReport.pdf) and [https://www.biologicaldiversity.org/programs/energy-justice/pdfs/2022-4-27\\_Letter-to-World-Leaders-re-End-Fossil-Fuel-Era-Accelerate-Transition-to-Renewable-Energy.pdf](https://www.biologicaldiversity.org/programs/energy-justice/pdfs/2022-4-27_Letter-to-World-Leaders-re-End-Fossil-Fuel-Era-Accelerate-Transition-to-Renewable-Energy.pdf)
  - 5 Cf. <https://www.4coffshore.com/news/california-energy-commission-unveils-20gw-offshore-wind-by-2045-goal-nid26078.html> and <https://www.pewtrusts.org/en/research-and-analysis/blogs/stateline/2022/07/29/more-states-back-offshore-wind-citing-economic-potential>
  - 6 <http://longbeach.legistar.com/LegislationDetail.aspx?ID=5339579&GUID=01F8BF18-477B-4C80-8D34-C3689A4D8691>
  - 7 <https://grist.org/energy/the-plan-to-turn-blighted-houses-into-a-new-source-of-green-power-for-the-grid/>