



To: The Long Beach City Council

From: Los Cerritos Wetlands Task Force, Sierra Club

Re: Public Hearing regarding approval of the City of Long Beach Climate Action and Adaptation Plan/CAAP PEIR and determining that it is consistent with the City's Certified Local Coastal Program. City Council Meeting, August 9, 2022, Agenda Item 8, File # 22-00918, # 22-00919.

*"Climate change is ultimately a planning problem: there is no entity other than the state that can electrify the country, expand the grid, build prodigious amounts of mass transit and wind down coal, oil and gas production in time to keep warming short of catastrophic levels."* Kate Aronoff, The Guardian, August 9, 2022

**The Los Cerritos Wetland Task Force, Sierra Club, offers this critique of CAAP's Adaptation Objectives and Actions to point out some of the shortcomings of a plan that is inadequate to address the harsh realities of the climate crisis. CAAP fails to address species extinction, economic and racial disparities, and the dispossession of tribal lands and rights exacerbated by a local economy addicted to fossil fuels. CAAP sacrifices environmental and social sustainability in order to accommodate existing and expanding coastal development and infrastructure focused primarily on industrial, commercial, and real estate interests. The LCWTF did not participate in shaping this document, HOWEVER, our comments will be familiar to those who did, and to the Council Members as well. We have submitted them multiple times in other contexts related to policies, permits, practices, and developments that harm our City, including damage to and erasure of natural areas and tribal sacred sites.**

**CAAP's Glaring Omissions:**

- **No plan to reduce/end local fossil fuel extraction, production, export/import.**
- **No plan to shut down SERRF, end burning of plastic and other toxic trash.**
- **No plan to regulate/end local plastic production/sales, address plastic pollution.**
- **No timetable or financial plan to safely shut down wells that do or will leak methane and other toxins.**
- **Does not take into account climate change impacts on/from major local projects that are proposed/approved but not yet built.**
- **Does not guarantee safe drinking water for all residents or prioritize water quality use for preservation of nature.**

- Does not advocate for community swimming pools and neighborhood parks as “cooling centers” in marginalized communities.
- No planned retreat. No plan to limit/end construction in coastal areas subject to SLR, storm surges, flooding due to climate change.
- No commitment to preserve sacred sites/natural open spaces or inclusion of traditional tribal land management practices.
- No plan to reduce hardscape by incentivizing the removal of structures and paved areas, and restoring natural creeks and other waterways.
- Does not critique/alter City policies, practices, and permitted activities that contribute to climate change and harm public health and the ecosystem.

**NOTE:** CAAP text in **BLACK**, LCWTF comments in **RED**

## **ADAPTATION OBJECTIVES AND ACTIONS**

**Actions are organized into four climate impacts: EH - Extreme Heat, AQ - Air Quality, DRT - Drought, SLR - FLD - Sea Level Rise and Flooding**

### **1. EH - Extreme heat - set up to ensure and improve public health and safety in the face of extreme heat events. All residents have access to services and programs to withstand extreme heat events**

**EH-3** Expand and enhance urban forest cover and vegetation to mitigate urban heat island conditions.

**Do not build artificial turf sports fields.**

**Do not replace natural areas in public parks or on public beaches with paved areas or buildings.**

**Enforce permit regulations (CDPs and City) regarding the trimming and removal/replacement of public trees by private parties.**

**Do not permit development on lands suitable for use as carbon storage and water retention**

**Reshape lands, enhance soil quality to increase water retention.**

**Reduce/remove hardscape as part of the public planning process, incentivise the removal of hardscape and de-incentivise expanding hardscape by private entities (tax-incentives, etc.**

**To restore ecosystems, establish open space areas/wildlife preserves with limited or no public access.**

**EH-3.1:** Update the Urban Forest Management Plan with a focus on prioritizing reduction of urban heat island conditions through both increased urban forest and enhanced vegetation.

**Restore, create ecosystems of CA Native trees and plants in public spaces. Plant trees that provide nesting/roosting sites for birds. Reduce trimming of city trees. Do not trim public trees during nesting season/in summer months when shade is needed. For their own health, trees should be trimmed in the winter months.**

**EH-3.2:** Identify tree planting opportunities in subwatershed areas with the lowest urban forest cover to minimize stormwater runoff and help protect the area from flooding during intense storm events.

**Do not remove public trees, including parkway trees, unless they are a threat to public safety. Require 2 to 1 replacement of any public tree with mature trees that provide an equal or greater public benefit: shade, bird habitat, etc. Include existing trees/plant trees as part of drought-tolerant planting policies and public landscaping projects. Do not build/expand on open spaces subject to sea-level rise. Identify and preserve areas to serve as SLR/flood control buffers, carbon sinks, retention of groundwater.**

EH-3.3: Identify and prioritize the planting of drought-tolerant or California native trees to enhance and expand urban forest cover and vegetation.

**Plant and maintain trees to support nesting/roosting birds and other wildlife, including native insects. Protect active nesting and roosting sites from human activities. Do not use herbicides, reduce lawns/expand meadowlands in parks, reduce mowing, edging, eliminate leaf blowing by maintenance crews, expand mulching to regulate growth.**

**EH-3.4:** Identify and involve community stakeholders in the planning process to inform urban forest cover needs and priorities.

**Take direction from tribal culture keepers and tribal ethnobiologists. Listen to the Los Cerritos Wetlands Task Force, Sierra Club. Do not engage in wholesale removal of any species of tree, notify public and allow for public comment/appeal when public trees are to be trimmed/removed.**

**EH-3.5:** Evaluate the cost of water and other infrastructure to provide ongoing maintenance for trees, and seek ways to meet those costs through the City's budget process, Capital Improvement Program, grants and other funding or financing opportunities.

**Prioritize use of recycled water for maintenance of public parks and parkways, reduce use of water for street sweeping, and other cleaning of hardscapes, eliminate use of potable water, including recycled water by THUMS or any other oil/gas extraction operation**

**EH-4:** Install Additional Water Fountains and Take Other Actions to Increase Public Access to Water.

Equity Strategy: Prioritize public water access in areas most impacted by extreme heat, with a focus on opportunities to serve children, seniors, core transit riders, and low-income communities.

**BUILD COMMUNITY POOLS!**

**EH-6:** Enhance and expand the accessibility of cooling centers.

**Community pools are cooling centers! Parks with shade trees are cooling centers. Do not limit definition of cooling centers to air conditioned buildings!**

**EH-6.1:** Evaluate the existing cooling center network and identify various means to expand access, prioritizing neighborhoods and households most vulnerable to extreme heat. Expand

**Equity Strategy** Prioritize increasing access to cooling centers for those most at-risk of heat-related injury, illness and death, such as people experiencing homelessness, seniors, young

children and infants, pregnant women, people with chronic illnesses, transit riders, and outdoor workers.

**BUILD COMMUNITY POOLS IN LOW INCOME INLAND NEIGHBORHOODS WITH A HISTORY OF MARGINALIZATION DUE TO RACISM AND CLASSISM. PROVIDE FREE SWIMMING LESSONS TO RESIDENTS TO MAKE COMMUNITY WATER SAFE WHEN AT BEACHES**

**EH-8:** Improve Beach and Coastal Transit Access During Extreme Heat Events. During extreme heat events, coastal temperatures are often significantly lower than those farther inland. For those residents who do not have access to a car or are unable to drive, public transit that accesses the coast and beach offers a reprieve from high temperatures and provides additional recreational opportunities.

**Provide free public transit. Provide shaded bus stops. Ensure that community members are water safe/can swim so that they can safely engage in wading, swimming, and other water recreation at public beaches. Address pollution of ocean waters and beaches by port traffic and tenants, local industry, storm runoff.**

**2. AQ - Air Quality, Goal: All Long Beach communities have clean air and improved public health**

**Monitor air quality violations throughout the City. Provide air quality monitors to residents when a source of air pollution is determined to be intentional/part of the regular operation of a business, or an “accidental release” that reoccurs multiple times. Prohibit fireworks displays/shows by public and private entities within City limits. Prohibit events like the Grand Prix which contribute significant GHG emissions. Shut down SERRF.**

**AQ-2 (AQ 2.1 -2.4):** Encourage urban agriculture practices that reduce air quality pollution. Include all kinds/areas of land management, not just agriculture.

**Formulate additional planting/soil enhancement strategies that contribute to air quality in landscaping, fire prevention measures, for public and private open spaces. Ex: encourage restoring Ca native plant meadows in private and public spaces (small and large).**

**AQ 2.4:** Develop educational and training opportunities for drought-tolerant urban agriculture.

**Training in permaculture and other sustainable land mgt practices, training in tribal ecological practices, take direction from traditional tribal ecologists, grow CA native plants for food, medicine, and to support/restore ecosystem and wildlife.**

**AQ-6:** Implement the San Pedro Bay Ports Clean Air Action Plan

**Ban Coke. End production/storage/transportation of coke within city limits, including export from Port of Long Beach.**

**AQ-7** Increase Monitoring and Regulation of Oil Extraction and Refining Process, Establish air monitors outside of active wells that are within the Long Beach city limits. Conduct an audit survey of all methane emissions to check possible emissions coming from either active or abandoned oil wells. Air quality impacts from local oil and gas operations are minimized. Increase monitoring and regulation of oil extraction and refining process. Also: Building and Energy Actions **BE-8**, Implement short-term measures to reduce emissions related to oil and gas extraction. Reduce emissions from local oil and gas extraction.

**Monitor emissions from oil and gas refinery/storage sites. Calculate projected emissions from approved but not yet operational projects/activities into predictions of GHG emissions. Set timetable, create plan to reduce/shut down oil (and gas) extraction, storage, and refining within city limits. Fund shut down of abandoned wells and city owned wells (prioritize in Tidelands Area funding). Address climate/health impacts of plastic production as a by-product of fossil fuel extraction.**

**3. DRT - Drought, Goal: Long Beach has a more sustainable and diverse water supply that reduces dependence on imported water and improves long-term water security**

**Do not use potable groundwater water in oil/gas drilling and/or refining operations. Phase out, do not expand, water injection drilling operations. Prioritize use of recycled water for maintenance of public parks and parkways. Reduce use of water for street sweeping and other cleaning of hardscapes. Eliminate use of potable water, including recycled water, by THUMS and other oil/gas extraction operations. Ensure that a minimum amount of water is provided to all residential users, including tenants, regardless of ability to pay. Provide water to maintain city trees. Water department should not bill other City departments for water used to maintain public green spaces, city trees or to maintain public facilities such as bathrooms/drinking fountains, public pools. To protect groundwater and public health, end, ban use of pesticides and herbicides on lands/in waters within city limits.**

**DRT-3:** Expand Usage Of Green Infrastructure And Green Streets. Incorporate green infrastructure and green streets to diversify water supply, increase natural and stormwater capture, prevent urban runoff, reduce the demand on existing infrastructure, reduce the heat island effect, and increase sustainability and resiliency.

**DRT-3.1:** Study and identify locations that are best suited for green infrastructure, such as areas that are prone to frequent flooding during heavy rainfall events.

**Do not permit new development in “areas that are prone to frequent flooding during heavy rainfall events.” Do not permit development in wetlands or on lands that support wetlands ecosystems. Conserve open space to provide natural habitat, absorb storm runoff, build groundwater capacity, prevent drought conditions, reduce use of imported water, and delay salt water intrusion. Require solar panels on every new building and on all existing public buildings and parking lots.**

**DRT-4:** Expand Usage of Recycled Water and Greywater for Non-Potable Use. Increase and incentivize recycled water and greywater use to establish a more diverse water supply portfolio.

**Do not use potable or recycled water in oil and gas operations.**

**DRT-5:** Incorporate Increased Rainfall Capture and Other Actions to Maximize Local Water Supplies and Offset Imported Water. Increase and incentivize rainfall capture and other actions to establish a more diverse water supply portfolio and maximize local water supplies from stormwater capture, recycled water, and groundwater.

**Reconfigure/restore soils in open spaces to allow for retention of water, including absorption of rainfall and storm runoff. Remove hardscapes to rediscover, restore local springs and streams, incorporate streambeds into landscaping.**

**4. FLD - Sea Level Rise and Flooding. Goal: Long Beach understands and is prepared for its future flood risk**

**No acknowledgement of the contribution of local fossil fuel extraction/production, storage, and transportation to local SLR/flooding. No plan to reduce/eliminate local fossil fuel extraction or assessment of the environmental and economic impacts of intentional/accidental releases of GHG, oil, and other toxins into local air and waters.**

Short-Term Actions (to 2030) City plans and policies are forward-looking and ensure projects and investments account for projected sea level and flooding impacts

**FLD-1:** Update and Augment Floodplain Regulations as Necessary. Update and augment floodplain regulations as necessary to limit, elevate, or provide floodproofing standards for development in areas designated as vulnerable to flooding in order to minimize physical damage to development...Longer-term updates may consider managed retreat if projections and observed local impacts warrant it.

**“Current projections and observed local impacts” demand that managed retreat be implemented immediately, not just considered/investigated in the long term. Prohibiting development and managing the retreat of current development are the most viable and economically/environmentally sustainable solutions to the inevitability of SLR/flooding in coastal and low lying areas and must not be postponed.**

**FLD-2:** Incorporate sea level rise language into citywide plans, policies, and regulations.

**Do not build on the beach! No Belmont Beach and Aquatic Center/BBAC. Do not build structures on soils subject to SLR, storm events, liquefaction, tsunamis.**

**FLD-6:** Conduct Citywide Beach Stabilization Study.

**Trucking in sand is harmful to air quality and shoreline ecosystems, is becoming more than a seasonal or temporary measure, and provides no long term benefits. Limit coastal development on beaches and at sea level. Prioritize managed retreat instead.**

**FLD-7:** Review and Conduct Studies of Combine Riverine/Coastal Flooding and Increased Severity of Rainfall Events on Watershed Flooding.

**Do not degrade/reduce wetlands/parklands/beaches in order to provide SLR/storm event buffers or convert them to storm water basins at the expense of existing ecosystems.**

**FLD-8:** Enhance Dunes - Convert seasonal storm berms to year-round dunes through active dune restoration as part of an adaptive management strategy. Discontinue beach grooming and plant native dune species to allow natural vegetation to stabilize dunes and hold sand.

**Plant trees that support coastal birds adjacent to dunes.**

**FLD-8.5:** Consider combinations of options to provide flood/erosion protection in Belmont Shore and the southeast tip of Alamitos Peninsula.

**Do not permit new shoreline structures that will require beach nourishment and/or must be demolished within their serviceable lifetime due to projected SLR/storm events. Belmont Shore and the Peninsula are coastal areas with high income residential and commercial properties. Environmental justice requires prioritizing low income communities. Do not allocate Tidelands or other public monies for new/expanded public development such as the BBAC. Limit flood erosion and protection to existing structures in Belmont Shore and on the Peninsula.**

Medium-Term Actions (2030-2050) Vulnerable infrastructure is elevated or relocated

**FLD- 10:** Relocate/elevate critical infrastructure.

**Develop plans/funding sources to relocate/elevate additional structures, including private residential properties (especially those in disadvantaged areas). Prioritize relocation in Tidelands budget, provide additional funding in Port and City budgets and in grant applications. Do not include oil/gas operations as “critical infrastructure.”**

Long-Term Actions (2050-2100), Long-term physical adaptation strategies are selected and implemented based on additional research and community adaptation priorities, and prioritize natural solutions whenever possible.

**FLD-11:** Elevate Riverine Levees.

**Do not add levees that will compromise existing wetlands/riverine ecosystems. Do not add levees to maintain/expand fossil fuel operations, including drilling operations on or offshore, pipelines and transportation corridors across or impacting wetlands/waterways/shoreline in coastal zone.**

**FLD-12:** Expand Beach Nourishment.

**Do not expand beach nourishment to address SLR. Do not permit expansion of existing structures or construction of new structures that will require beach nourishment to address SLR or flooding due to storm surges, within their lifetime.**

**FLD- 4/15:** Elevate street hardscapes, streets, pathways.

**Reduce number and size of transportation corridors threatened by SLR/flooding.**

**FLD-17:** Retreat/realign parking lots.

**Do not relocate parking lots to existing beaches, parks, wetlands or build new parking lots in these places.**

**FLD-19:** Investigate Feasibility of managed retreat.

**Managed retreat must be implemented, not just investigated, immediately. This is the only viable solution to the inevitability of SLR/flooding and cannot be postponed.**

**FLD-20:** Evaluate storm surge barrier at Alamos Bay.

**Protection of a wealthy, advantaged coastal area with high income residential and commercial properties should not be prioritized.**

