



Date: Tuesday, January 5, 2021

To: Mayor Robert Garcia, 1st District-Councilmember Mary Zendejas, 2nd District-Councilwoman Cindy Allen, 3rd District-Councilwoman Suzie Price, 4th District Councilman Daryl Supernaw, 5th District Councilwoman Stacy Mungo, 6th District Councilwoman Suely Saro, 7th District-Councilman Roberto Uranga, 8th District Councilman Al Austin, 9th District Councilman Rex Richardson, City Manager Tom Modica

From: Long Beach community members

Re: City Council meeting of January 5, 2021, Agenda item #17 – “Recommendation to receive a report and confirm the proposed Climate Action and Adaptation Plan, and direct staff to prepare the subsequent Environmental Impact Report.”

**We, the undersigned Long Beach Community members, request the City Council to take the following actions:**

**We urge the Council to Receive and File the Proposed CAAP and to deny the staff recommendation to confirm it.**

**We also urge the Council to instruct City staff to revise the Proposed CAAP and its Appendices, and to return a new draft in a form that enables the Council, Mayor and Long Beach community members to efficiently evaluate the proposals.**

We have studied the Proposed CAAP, and unfortunately find that it is seriously deficient in several fundamental ways:

- 1. The information is written and organized in a way that prevents policymakers (City Council) and the community from evaluating the proposed actions.** The information itself is not inherently difficult to understand, but the unclear writing and disjointed organization of the documents is an obstacle to critical evaluation of the proposals. The reader cannot easily find the evidence and arguments supporting the proposals.
- 2. The Proposed CAAP fails to meet the 2030 greenhouse reduction goals mandated by SB32, the most basic requirement for a CAAP.** The Actions & Implementation Actions that we have been able to evaluate fall far short of what is necessary to combat global warming and protect Long Beach community against harm from climate change impacts.
- 3. “Equity Strategies” for the proposed Actions are presented as sidebar comments, and are almost never even mentioned in the Implementation Actions.**

These three points are further explained below.

It is urgent to take actions to constrain global warming and protect the people of Long Beach against harm from climate change. A strong Climate Action and Adaptation Plan can be a strategic guide to action. However, it would be a mistake to hastily adopt a deficient CAAP. First of all, not adopting the CAAP does not prevent the City from taking actions. Second, the adoption does not result in any actions. The implementation of any particular plans would still need focused analyses, the passage of ordinances and regulations, budgets and funding allocation, staffing and management, enforcement, and more. It is most important to get it right.

## **EXPLANATION OF DEFICIENCIES IN THE PROPOSED CAAP**

**1. The information is written and organized in a way that prevents policymakers (City Council) and the community from evaluating the proposed actions.** The information itself is not inherently difficult to understand, but the unclear writing and disjointed organization of the documents is an obstacle to critical evaluation of the proposals.

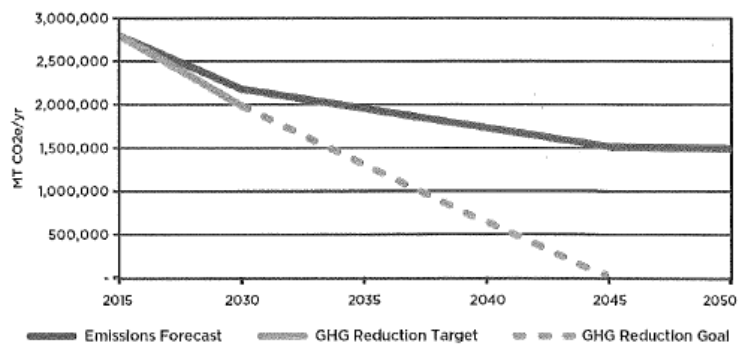
- a. The Proposed CAAP almost never states goals quantitatively, so readers cannot assess the magnitude of a problem, or the effort and resources needed to address it.* Examples of quantitative goals are the number of climate change-based injuries, illness and deaths threatened and avoided, or tons of greenhouse gas emissions prevented. The Proposed CAAP does not state how, when, or how much of any Action must be implemented. Instead, the goals are generally qualitative (“increase,” “encourage,” “promote”). No objective basis is provided for rationally making policies, setting priorities and allocating resources.
- b. The reader cannot easily find evidence and arguments supporting the proposals.* Descriptions of the problems (such as greenhouse gas emissions or climate change threats to health), and their solutions (Implementation Actions) are presented in separate documents, and the reader must juggle between two or three documents to decide if the proposed solutions are appropriate. The Proposed CAAP text does not provide references to the evidence and arguments supporting its proposals, leaving the reader to search through all the Appendices for that information.
- c. Moreover, it is difficult to find information in the Appendices because most do not have either a Table of Contents or Index.*
- d. The documents use inconsistent terminology, categories and timeframes in the text, charts and tables, forcing readers to translate their meanings and recalculate the data to make comparisons.*

### ***The revised documents should include the following:***

- Accurate and concise summaries of each Action and Implementation Action in the Proposed CAAP.
- Quantified descriptions of each problem and the Action/Implementation Action that addresses it. The description must include goals and timelines. The goal must identify the intended end results (e.g., tons of greenhouse gas emissions reduced or injuries, illnesses and deaths prevented) rather than merely process-related action (e.g., assessing, encouraging).
- References in the Proposed CAAP to the sections in the Appendices that explain and justify the Implementing Actions must be clear and easily accessible.
- Each Appendix should include a Table of Contents and Index of items that pertain to the CAAP.

**2. The Proposed CAAP fails to meet the 2030 greenhouse reduction goals mandated by SB32, the most basic requirement for a CAAP.** Other Actions & Implementation Actions that we have been able to evaluate fall far short of what is necessary to combat global warming and protect LB community against harm from climate change impacts.

*The Proposed CAAP shows a 29% reduction in greenhouse gases by 2030, rather than the 40% reduction mandated by state law.* Serious deficiencies are found throughout the Proposed CAAP, but perhaps the most glaring is displayed on the first two pages of document R-17, in the discussion on greenhouse gas GHG reduction plans. The opening sentence states that the one of the two objectives of the CAAP is to “meet the statewide greenhouse gas (GHG) target of 40 percent below 1990 levels by 2030” (SB32). The chart on page two illustrates what the CAAP intends to accomplish (Figure 1. City GHG Emissions Targets vs. Forecasts 2015-2050) (from Figure 20, p.137 in the Proposed CAAP):



The goal for the LB CAAP is a 40% reduction in emissions from the 2015 level by 2030. (The year 2015 is used as a proxy for the baseline year of 1990.) However, the chart indicates a reduction of about 29%, far short of the required 40% reduction. (The chart indicates 2015 emissions of about 2,800,000 MT, and 2030 emissions of about 2,000,000 MT, a 29% reduced.) ***The Proposed CAAP fails to meet the 2030 greenhouse reduction goals.***

*Furthermore, the Proposed CAAP may actually only achieve a 13% emissions reduction,* according to data provided in Appendix A (Table 18, p.22). Table 18 shows that if all of the mitigation Implementation Actions are fully executed, total GHG emission would be reduced by “363,250 MT,” which is 13% of the 2015 level. We could find no explanation for this discrepancy.

*The text accompanying the graph is both confused and confusing.* (Please refer to the last paragraph on page 1, beginning with “Table 1 demonstrates.”) It presents a “business-as-usual” forecast as the baseline for setting reduction targets. “Business-as-usual” forecasts cannot be used for setting emissions reduction targets, which are based on the damage done by total emissions. Furthermore, the chart (Fig.1) uses total emissions rather than BAU, an example of the disjointed character of much of the information in the Proposed CAAP.

*Unnecessarily detailed numbers discourage readers.* Finally, the paragraph also provides numbers that have not been rounded for readability (e.g., it uses “2,176,931” rather than “2,200,000” tons of CO2), an unnecessary level of precision which is well-known to discourage readers, which should not be used in an introductory summary. This is an example of the poor writing that needs to be corrected in a re-written Proposed CAAP.

Because of the Proposed CAAP’s communication problems, and the short time since its public release, we were only able to analyze a few of the proposed actions, but nevertheless found

multiple serious deficiencies and omissions. We will prepare a more thorough evaluation of the Proposed CAAP, which would be more useful to our city if Council decides to make the Receive and File action.

**3. “Equity Strategies” for the proposed Actions are presented only as sidebar comments, and are almost never even mentioned in the Implementation Actions.** Each Action has a sidebar containing an Equity Strategy statement. However, the strategies are rarely included in the Implementing Actions, which are the items in the CAAP that can lead to actual policies and programs. Placements in sidebars are unacceptable, empty gestures. It is entirely at odds with this year’s Citywide discussions on social justice, and ignores the recommendations in the *Long Beach Equity Toolkit for City Leaders and Staff*. The Equity Tool for Policy Development (p.20) recommends that policies be developed by answering questions including: “How will this policy reduce racial, economic, and social disparities to advance equity?” and “If disparities are identified, how can they be reduced or eliminated to advance equity?” This was not done in the Proposed CAAP. *Equity Strategies must be fully included in the Implementing Actions.*

We would be happy to meet with you or your staff. (Contact Dean Toji at Dean.Toji@csulb.edu).

Thank you for your consideration of our recommendations.

(Signatures listed alphabetically, organizations are listed for identification purposes only)

Marlene Alvarado, District 1

Rev. J. Steven Beckham, Gloria Dei Lutheran Church, Long Beach, Living in District 5, Serving in District 3

Marianne Buchanan, Long Beach 350, District 3

Ibrahim Dyfan, South Coast Interfaith Council, District 8

Gisele Fong, resident, District 7

Rev. Scott Fritz, Trinity Lutheran Church, District 1

Patti Heckman, South Coast Interfaith Council, District 8

John Kindred, LB350, LiBRE, Long Beach Environmental Alliance and Coalition for a Smoke Free Long Beach, District 1

Sandra E. Kroll District 3

Kerry Martin, Long Beach 350, District 5

Ron Nelson, Justice and Peace Committee of the South Coast Interfaith Council, District 5

Jeannine Pearce, resident, District 2

Karen Reside. Long Beach Gray Panthers, District 1

Clay Sandidge, Long Beach Community Choice Energy Working Group, District 5

Alice Lee Stevens, Long Beach 350, District 4

Harold Sutherland, South Coast Interfaith Council, District 7

Dean Toji, Long Beach 350, District 7

Margaret Towner, District 3

Stella Ursua, GRID Alternatives Greater Los Angeles, District 2

Dale Whitney, South Coast Interfaith Council, District 2