

From City of Long Beach staff
8/11/18

Comments on the Coastal Commission Staff Report
LCPA No. 1-18 (LCP-5-LOB-18-0026)

1. Resolutions 1 and 3	Since the standard of review for LCP Amendments is the Coastal Act, can the second sentence of each resolution be revised to reference the Coastal Act instead of CEQA? Although we understand this is standard language, it implies that the City's EIR did not adequately look at alternatives and all feasible mitigation.
2. Page 12, Section 2.c.xi.:	Please insert "with the City" after "operator" on line 5 of this subsection. This would clarify that the bond is to be posted with the City.
3. Page 31, fourth line from the bottom of the first paragraph on the page:	Typo: delete "...0"
4. Page 25, 2nd paragraph, last sentence	Add "and zoning" after "governing policy"
5. Page 37, First Paragraph	Comparison of existing to future oil production: The staff report provides a comparison of <u>existing production</u> to future <u>production capacity</u> and describes the project as resulting in an 8000% increase. The comparison is apples to oranges and as a result exaggerates the increase in production capacity that would be allowed under the project. The current peak <u>production capacity</u> of the existing oil operations is 10,000 barrels per day. The project has offered to voluntarily reduce the peak production capacity by 75% to 2,500 barrels per day. The proposed project's peak production capacity is 24,000 barrels per day. The project will increase peak production capacity by 240% not 8000%. Thus, if you compare the existing peak production capacity to the future peak production capacity, the numbers would be 10,000 to 24,000 barrels per day, not 300 to 24,000 barrels per day. In reality, once the new production facilities are constructed and in operation, the average daily production will be much less than 24,000 barrels per day as the site will not operate at <u>peak production capacity</u> every day. This text should be revised as follows: For example, the current oil operations on the Synergy and City sites has a peak production capacity of 10,000 barrels per day from 34 wells. With new drilling technology, BOMP's peak production capacity will be 24,000 barrels per day from approximately 60 wells, an increase in production capacity of almost 240%.

Tagab, Clarita@Coastal

From: Lucy Johnson <lucyjohnson1@gmail.com>
Sent: Monday, August 06, 2018 1:01 PM
To: Coastal Los Cerritos Wetlands
Cc: Heather Altman; John McKeown
Subject: Los Cerritos Wetlands letter of support

Dear Ms. Huckelbridge:

Below you will find my letter for the members of the California Coastal Commission. Please include it in their packets for the meeting on Wednesday. Thank you.

Lucy Johnson

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Dear Members of the California Coastal Commission:

"Keep the Oil in the Soil." You may see this cute slogan at your meeting on Wednesday.

In an ideal world, we would no longer need fossil fuels. However, we all know we do not live in an ideal world.

This past October, I toured the Synergy Oil site during one of the Open House days. Not knowing what to expect, I was taking advantage of the opportunity to closely observe a portion of this normally closed area that I drive past daily.

After viewing a presentation of the restoration plan, walking around the site, and speaking with representatives of the Los Cerritos Wetlands Authority (LCWA) and Synergy, I am impressed with the plan to consolidate and modernize the oil operations, and over time, restore about 150 acres of wetlands.

From what I saw and learned about the project that day and since, this is a tremendous opportunity for all parties: the City of Long Beach, the general public and the LCWA.

The trade of about five (5) acres of LCWA land near the project for the 150+ acres in the Synergy oil field, and the commitment of Synergy and its partners to consolidate all oil operations into two parcels totaling approximately ten (10) acres (including the "pumpkin patch" acreage) is a trade that benefits all. For that to happen, we are here to ask that the amendment to the Local Coastal Plan under consideration by you **must** be approved.

While certain members of the public have a few concerns, specifically air pollution, fracking and pipeline leak, those are addressed in the plan. The EIR addresses air pollution, indicating additional air pollution will/may occur during the heavy construction period, then return to normal levels. Fracking is done only where oil exists in areas of shale, and to my knowledge, Long Beach is not an area with shale. The plan and the EIR address the potential for oil leaks.

Upon approval from the Coastal Commission and all the permitting authorities, the blight now seen on both sides of 2nd St between Studebaker and Pacific Coast Highway will be eliminated over time.

- Existing wells will be abandoned, pipes removed, and the wells permanently sealed.
- Pipelines will be removed, and a much shorter length of new pipelines constructed, using today's construction standards for pipelines.
- New pipelines will primarily be above ground, to allow easier access for inspections.
- Holding tanks will be removed from the site, with new storage facilities to be constructed on the remaining ten acres of Synergy property.
- Newer technology will allow the oil operations to consolidate new wells in a condensed area, with the visibility of any new pumping and storage equipment being vastly less than what can be seen now.
- Once completed and operational, no significant environmental impacts are expected.
- Also upon approval from all permitting authorities, the restoration of the wetlands on roughly one-half of the current Synergy site will commence. Just imagine the beautification of the site and the return of native wildlife! The Los Cerritos Wetlands will become one of Long Beach's most treasured assets, enjoyed for years to come by residents and visitors alike.

This is a tremendous opportunity to ensure the future of the Los Cerritos Wetlands, and one that the California Coastal Commission cannot afford to pass up. I therefore urge the members of the Commission to unanimously approve your staff's recommendations for the Amendment to the Local Coastal Plan in front of you now.

Thank you for your consideration of my comments.

Lucy Johnson
2402 Petaluma Avenue
Long Beach, CA 90815
562.431.0052 (cell)
lucyjohnson1@gmail.com

Tagab, Clarita@Coastal

From: Melinda Cotton <mbcotton@hotmail.com>
Sent: Monday, August 06, 2018 11:27 AM
To: Energy@Coastal; Huckelbridge, Kate@Coastal
Cc: Posner, Chuck@Coastal
Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

Re: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

To: California Coastal Commission and Interested Persons and Staff Members

From: Melinda Cotton

Dear Commissioners,

My name is Melinda Cotton. I am a Long Beach resident, and have lived in Belmont Shore for 35 years. The Los Cerritos Wetlands are less than 2 miles from my home.

First I would like to say that I greatly appreciate the excellent Commission Staff Report, put together by Senior Environmental Scientist Dr. Kate Hucklebridge and her colleagues. They have closely analyzed the dangers and ramifications of allowing oil drilling and production on two additional sites adjacent to the fragile Los Cerritos Wetlands, and I believe they have done their very best to find and include ways to protect the Wetlands.

However, it's impossible for me to believe that ADDING oil drilling and production on these already damaged Wetlands is a positive good.

I'm a longtime member of the Los Cerritos Wetlands Land Trust.

I understand that the LCWLT Board and others are optimistic that the proposed BOMP Project - allowing 120 new additional oil wells in exchange for proposed wetlands restoration - will ultimately work out. But I remain

skeptical. (As you know, the LCP Amendment before you is required before the BOMP Project can move to the CDP Stage).

There are just too many dangers, nearly all of which are mentioned in the Staff Report. The danger of a major earthquake along the immediately adjacent Newport-Inglewood Fault, the prospect of damage to tribal resources, the danger of floods, tsunamis, ongoing climate change and the expected sea level rise that will likely inundate the Wetlands in some 40 years.

There are other questions and concerns. If our dreams and hopes for solar, wind and new, non-polluting energy sources come to pass - the price of oil may plummet -- to a point where the new wells and restoration will be financially infeasible. Would we then be left with a worst mess? And the LCP change opens the door not just to Beach Oil Mineral Partners with its promises of restoration, but to other oil drilling companies which may operate differently.

Another concern of Coastal Commission Staff and many of us is the near permanency of the Oil Drilling Rigs themselves. The EIR approved by the City allows the oil operators to install 160 foot tall and 120 tall Drilling Rigs that will be positioned on both the Pumpkin Patch site and the LCWA site for up to 14 years (and the 120 foot redrilling rigs for subsequent years). The DEIR claimed these would be temporary, because although the rigs remained on the sites "they will continue to be moved around the site during this time..."

And these two new drilling sites are at "Gateway" entrances to the City of Long Beach: the Pumpkin Patch is on Pacific Coast Highway at the main entry and exit to Long Beach on its southern border. The LCWA site is the City's "Gateway" entrance and exit from the 405 Freeway and 2nd Street. The City has long extolled the importance of beautifying and improving these "Gateways" - yet every day thousands of tourists and travelers from all over will see these oil drilling rigs as tall as 12 and 16 story buildings towering over the Wetlands, San Gabriel River and ocean portals. The message would seem to be that Long Beach, and indeed the state and its protective commissions, condone ongoing oil production in the face of dangerous climate change, sea level rise, etc.

At a time when the Trump Administration is calling for rolling back vehicle mileage standards and rules designed to slow down climate change - it seems incongruous for the Coastal Commission and City of Long Beach to be promoting more than 120 new oil wells.

Again, I understand that the promise of Wetlands restoration is driving today's hearing and the pressure to approve the modified LCP document before you.

But is this tradeoff, the proper answer or the best answer? I don't think so.

Thank you for your attention.

Sincerely, Melinda Cotton

Tagab, Clarita@Coastal

From: joeacastillo@aol.com
Sent: Sunday, August 05, 2018 2:47 PM
To: joeacastillo@aol.com; Energy@Coastal; Coastal Los Cerritos Wetlands; Huckelbridge, Kate@Coastal
Subject: Re: City of Long Beach LCP Amendments No. 1-18

California Coastal Commission

45 Fremont, Suite 2000

San Francisco, CA 94105-2219

August 1, 2018

Re: City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

Dear California Coastal Commission,

My name is Joe Castillo, and I'm an independent historical researcher and author, and am presently completing a study on the evolution of the term 'Tongva'. My research to date has included a review of 155 sources of information from 1774 through 2018. The study included a survey of multiple subject-related materials associated with the San Gabriel Mission, Southern California locations, Los Angeles and California history and Native Americans cultural, historical and anthropological records. My research included the following types of resources: a) published books, b) various documents and manuscripts, c) legislative documents, d) posters, e) maps, f) sites and signage, g) articles and h) websites. In addition, I have interviewed a variety of Native American and 'Tongva' authorities to gain a comprehensive understanding of the evolution of the term 'Tongva'.

My research has resulted in the following statements based on identified factual records:

- The Gabrielino's are recognized by the State of California as the aboriginal tribe of the Los Angeles basin. The Tongva are not recognized by the State of California which documented in its 1994 legislative research that there was 'no support' for the 'Tongva' name;
- The 'Tongva' term was first defined by C. Hart Merriam in 1903. Merriam was performing a study of California Indians by documenting their language, boundaries and tribal origins. In his notes, Merriam documented that the 'Tongva' were from Tejon and referenced the Indians at the San Gabriel Mission as 'San Gabriels'. Even though Merriam wrote the notes, they were not published until 1955 and 1966, after being compiled and edited by university researchers. In addition, Merriam's research practices were not considered conventional and were not reviewed, critiqued and accepted by his colleagues in the anthropological field;
- Prior to 1992, only 8 sources of the study population of 155 identified the term 'Tongva' and 7 of the 8 sources were based on information provided by Merriam. From 1774 to 1992, a period of 218 years, only two separate researchers identified and applied the term 'Tongva' in their professional works, and even then it was not in reference to a Los Angeles area based tribe;

- Since 1992, the study population identified 57 sources which reference the term 'Tongva' but do not provide detailed research data and information to support it as the authentic and accurate ancestral, cultural and historical name of the Gabrielinos.

In summary, my research has led to the following conclusions:

- The 'Tongva' name is inaccurate when referenced as a Los Angeles based tribe with negligible support from historical records and unconfirmed in comprehensive research studies by professional anthropologists;
- The 'Tongva' term primarily evolved in 1992 casting significant doubt on its validity as the aboriginal tribal name of Los Angeles based Indian tribes dating back to the Spanish Mission era and before.

As such, it is my recommendation, that any organization choosing to be associated with an entity named with the term 'Tongva' should reconsider its relationship until additional confirmed and validated evidence can be offered to support its claim as the aboriginal tribe of the Los Angeles Basin. Each entity should be able to provide ancestral, cultural and historical evidence in support of its claim as the aboriginal tribe of the Los Angeles basin. However, it is highly unlikely that such evidence even exists as starting in 1992 the 'Tongva' term was first associated with a Los Angeles based tribe even with negligible support for its ancestral, cultural and historical foundation. My study is expected to be finalized in September 2018 and will provide additional factual documentation in support of the information provided in this memo.

Thank you for your consideration on this matter,

Joe Castillo
Historical Researcher

Joe Castillo

Tagab, Clarita@Coastal

From: tsomoyog <tsomoyog@gmail.com>
Sent: Sunday, August 05, 2018 8:39 AM
To: Coastal Los Cerritos Wetlands
Subject: No Oil Drilling in Cerritos Wetlands

To Whom It May Concern:

I urge you to prevent oil drilling in the Los Cerritos wetlands. It is unconscionable to do so in the light of numerous wildfires burning in California. It is imperative that oil be kept in the soil to prevent further extreme weather events and subsidence caused by continued drilling in places vulnerable to earthquakes.

California cannot afford more emissions that such drilling would cause, not to mention the growing amount of children who might suffer increased respiratory ailments and asthma due to their proximity to drilling or refinery sites.

It cannot be the province of the few to drill for profit at the expense of depletion and pollution of our groundwater, beaches and the sacred sites of indigenous peoples.

Act as true "public" servants and heed what the people are telling you; be courageous enough to make the right moral decisions for future generations and the continuance of life.

Sincerely,

Carry Kim

--

Jin Lian Hua

Yoga:: Ayurveda

Healing Foods:: Breathwork

p | 310. 936. 1249

tsomo.com

Tagab, Clarita@Coastal

From: charles f Ward <wardchuck1@gmail.com>
Sent: Saturday, August 04, 2018 7:45 PM
To: Energy@Coastal; lisa.west@longbeach.gov; JOHN LEIPOLD;
heather@altmanenvironmental.com
Cc: Kathy Ward; Maureen Poe; Suzie Price District 3. Councilwoman
Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach
LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

August 4, 2018

Dear Commissioners,

Re: 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

I am in favor of Local Coastal Plan be amended to allow for oil drilling on the Project's two proposed sites (the Pumpkin Patch and the LCWA Site.)

There is an Active Earthquake Fault that divides this 168 Acres and the Whole Site.

The Project's two Proposed sites will pump and inject on opposite sides of this Fault. Thus NO drilling or injection operations will cross this fault.

The Wetlands and the existing oil operations will operate together. Bolsa Chica Wetlands is my vision for this area.

I am also in favor of the City of Long Beach's Oil Boundary Map updating to include the Projects proposed sites.

This will allow for the orderly and documented transfer and ownership of the proposed sites -- **(the Pumpkin Patch and the LCWA Site.)**

Thank you for your Time and Consideration,

Charles F. Ward
153 Angelo Walk
Long Beach, CA 90803

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GOD is the SOLUTION
CHANGE THE WORLD

Tagab, Clarita@Coastal

From: RACHAEL LEHMBERG <gpaboat@msn.com>
Sent: Saturday, August 04, 2018 3:04 PM
To: Huckelbridge, Kate@Coastal
Cc: Posner, Chuck@Coastal
Subject: Los Cerritos Wetlands

Dear Mr. Posner and Ms Huckelbridge,

The so-called "Wetlands Restoration" Project has been fundamentally dishonest from the start. The oil company dangled the promise of restoration in front of city authorities, but it is a meaningless promise. In the first place, this restoration is to take place over a period of 40 years. Second, the promise of restoration is a trick. Plans include crisscrossing the area with paths and creating a park on top of contaminated soil. We don't need this. We don't want this. Please help us keep our homes safe and our wetlands protected. Please say "no" to this dishonest proposal!

Thank you for your time. The Coastal Commission is a wonderful part of our government!

Sincerely,

Rachael Lehmberg
1603 Merion Way 42-K
Seal Beach, CA 90740

Tagab, Clarita@Coastal

From: Joyce Dalman <jdalprint@verizon.net>
Sent: Saturday, August 04, 2018 12:55 PM
To: Energy@Coastal
Subject: Los Cerritos Wetlands Land Use Plan

Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

I support the coastal staffs recommendations to amend the land use plan with the suggested modifications. This will allow for the oil wells to be removed from the wetlands and located elsewhere. This will also allow for restoration of the wetlands.

Thank you for your consideration.

Joyce Dalman
jdalprint@verizon.net
213-509-9240



Los Cerritos Wetlands Authority

August 3, 2018

**Governing
Board**

Suzie Price,
Chair
City of Long Beach

Samuel Schuchat,
Vice-Chair
Coastal Conservancy

Schelly Sustarsic,
Board Member
City of Seal Beach

Roberto Uranga,
Board Member
Rivers and
Mountains
Conservancy

Mark Stanley
Executive Officer

Kate Hucklebridge
California Coastal Commission
Energy, Ocean Resources & Federal Consistency Division
45 Fremont St. Ste. 2000
San Francisco, CA

Re: Los Cerritos Wetlands Oil Consolidation and Restoration Project

Dear Ms. Hucklebridge,

The Los Cerritos Wetlands Authority (LCWA) is a joint powers authority between the State Coastal Conservancy, the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy, and the cities of Long Beach and Seal Beach. The mission of the LCWA is to provide for a comprehensive program of acquisition, protection, conservation, restoration, maintenance, operation and environmental enhancement of the Los Cerritos Wetlands area consistent with the goals of flood and habitat protection, restoration, improvement in water supply and quality, groundwater recharge, and water conservation.

The LCWA has been working toward this mission since its inception in 2006. During this time the LCWA has acquired over 170-acres of land within the Los Cerritos Wetlands Complex as well as completing a Conceptual Restoration Plan for the entirety of Los Cerritos Wetlands. Furthermore, the LCWA's stewardship program has hosted hundreds of community programs focused on building an awareness for and implementing the mission of the LCWA.

The Los Cerritos Wetlands Oil Consolidation and Restoration Project will support the LCWA with achieving its mission since it will result in the acquisition of 154-acres of wetlands property that will be set aside for conservation into perpetuity. The project is also consistent with the goals and objectives of the LCWA's Conceptual Restoration Plan as it involves the restoration and expansion of tidal wetlands and will remove numerous constraints to habitat restoration through the consolidation of existing oil operation infrastructure. The realization of this project will result in expanded stewardship opportunities and public programs that will be hosted from the proposed visitors center.

The LCWA Board of Directors authorized an Option Agreement in August 2016 that outlines the terms through which the LCWA would transfer the approximately 5-acre "LCWA Site" property in exchange for Los Cerritos Wetlands, LLC's 154 -acre "Synergy Site" property. Since the signing of this agreement, the LCWA has been dedicated to tracking every aspect of this project as it has progressed through the permitting and entitlement processes. LCWA representatives have worked closely with the applicant's staff on the development of the project's Draft EIR and response to comments. We reviewed the 31 public comments letters that were submitted to the City of Long Beach as part of that public comment process and recognize the numerous topics of concern that exist for this complicated project. We also have held workshops for our own

restoration planning efforts and have become familiar with stakeholder concerns. We have met with the applicant on numerous occasions throughout the permitting process to ensure that all reasonable stakeholder comments are properly addressed and that all necessary agencies are being consulted.

LCWA staff has been impressed by the responsiveness of the applicant to our concerns and even more impressed by the applicant's coordination with Los Cerritos Wetlands stakeholders. The applicant has met with El Dorado Audubon and Los Cerritos Wetlands Land Trust on a consistent basis throughout the project. These two organizations have identified themselves as the most significant proponents for the conservation of Los Cerritos Wetlands and their perspectives on this proposed project are crucial to be acknowledged. Outside of these specific organizations the applicant has presented their project at all the major homeowner groups that surround the proposed project. Lastly, for the public at-large, the LCWA was impressed by the applicant's 3-day open house event that was held in October 2017. This event showcased the applicant's dedication to informing the community and their commitment to a transparent project planning process.

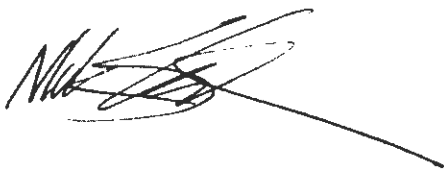
The LCWA has been afforded the opportunity to review all technical documents created for this project including the wetlands restoration plan. We hired several consulting firms to perform peer reviews of documents that most pertain to the LCWA's interests in the project and we provided the applicant with constructive feedback on how to improve these reports, often in advance of them being submitted.

As the LCWA continues to strive towards acquiring as much of the remaining Los Cerritos Wetlands and planning for its eventual restoration, we do not foresee a greater opportunity to conserve Los Cerritos Wetlands than what is being proposed by this project. This project will result in:

1. The public acquisition of 154-acres of coastal wetlands property that has been privately owned for over a century,
2. The restoration of tidal wetlands and buffer habitats on 77-acres of this property,
3. The consolidation and eventual full removal of antiquated oil operation infrastructure that currently constrains 100-acres of land, and
4. The transformation of the existing Bixby Ranch Building into a visitor's center with associated hiking trails.

The Los Cerritos Wetlands Authority fully supports the approval of the proposed Local Coastal Program amendment for the City of Long Beach with the modifications suggested by Coastal Commission staff as it is a crucial step towards the realization of this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Stanley', with a long horizontal line extending from the end of the signature.

Mark Stanley,
Executive Officer



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION
Historically known as The San Gabriel Band of Mission Indians/ Gabrielino Tribal Council
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Kate Huckelbridge
California Coastal Commission
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

Re: City of Long Beach LCP Amendment No. 1-18 (LCP-S-LOB-18-0026-1) (SEADIP)

Dear Mrs. Huckelbridge and California, Coastal Commission,

August 3, 2018

We, the governing body of the Gabrieleno Band of Mission Indians Kizh Nation, are writing to express our support for the Los Cerritos Wetland restoration project. We are the original Tribe that achieved California State recognition in 1994 under the name of Gabrielino Tribal Council. Our people and our vast tribal territory are well documented in anthropological records. We are the direct blood descendants of those historical people who are ancestrally affiliated with California's southern coastline from Malibu Creek in Los Angeles County down to Aliso Creek in Orange County.

My father, Chief Ernest Salas, often reminisces about this sacred site formally known as Povuu'nga now known as Rancho Los Alamitos because of our long ancestral connection to the area as well as his father being a favored employee of Mr. Bixby. He is saddened by the current state of Los Cerritos wetlands and has asked me to represent his personal concerns in regard to the restoration of this prestigious site. Chief Salas adamantly opposes any further drilling; he encourages that all wells, oil rigs, tanks, and auxiliary equipment be removed. Our Tribal Government wants this sacred site to be restored so it can support the wildlife that still live there and provide a beautiful site for the community to enjoy. However, there are a few very important points that we ask the Commission to consider and take under strong consideration.

First, we are the bloodline of the original inhabitants of Povuu'nga and are very much invested and connected to this sacred site beginning from the Natives through the Spanish era and eventually to the American era. Our Tribal members trace their lineage to many locations in our ancestral tribal territory with some of our Tribal members having lineage directly traced to the Gabrieleno/Kizh village of Povuu'nga. In addition, we are also lineal descendants to Juan Crispin Perez-Nieto, a Spanish soldier, the brother of Manuel Perez Nieto who received the largest land grant of Alta California (360,000 acres) and was the original owner of the Bixby adobe at Rancho Los Alamitos. Juan Crispin Perez Nietos is the third great grandfather to Chief Ernie. The main village area occurred on the bluffs overlooking the wetlands, where this resource-rich wetland area was heavily used for hunting (e.g water fowl & fishing) and gathering various seafood and valuable shell beds for our ancestors. It was

Andrew Salas, Chairman
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

www.gabrielenoindians@yahoo.com

gabrielenoindians@yahoo.com

also a very important site (crossroads) of trade routes for other Gabrieleno/Kizh on the Channel Islands as well as our neighboring tribes to the north of Malibu Creek (Chumash) and south of Aliso Creek (Juaneno).

Secondly, we are in favor of the additional modifications suggested by the Coastal Commission staff but would like to include supplemental language to Modification #2 for the protection and preservation of any resources that may still remain within the soil layers of the project area. For the investigation portion, we would like the term "investigation" better defined to use non-destructive techniques to assess for underground resources. The historical finds of Tribal Cultural Resources within ½ mile indicates the potential for discovery of resources during ground disturbing activities. As a precautionary measure to lessen the chance of encountering inadvertent finds, non-destructive methods shall be utilized to help discern and quantify areas of concern that shall be monitored during destructive ground disturbing activities.

Finally, for too many years, unaffiliated individuals have been claiming our birthright and undermining our Tribal Government's voice over our own resources and culture. It is imperative that we clarify this with your agency that we are not affiliated with "Tongva" nor are they affiliated with the Gabrieleno culture. Any individuals or "groups" that utilize this name are not tribal members of ours nor do they represent our interests in any way, shape or form. We are not a group, we are a Tribal Government and this issue is not an issue of an inter-tribal squabble, but rather an issue of the original Tribe having their history stolen by self-identified individuals. We are the original, true Gabrieleno tribe that existed before the written word. Our history is rich and we are very proud of the responsibilities it bears – to protect and preserve our culture and land. Many incorrectly refer to the original Native Americans of the area as "Gabrielino/Tongva." There is no such tribe as "Gabrielino/Tongva." The true ethnic name of the Native American Tribe was, and is, known as Kizh.

These newly formed Tongva groups have been "a thorn" in our sides since the 1990's— abusing and taking advantage of our elders, stealing our history and attempting to gain access to make decisions in the name of "Gabrieleno Tongva" – desecrating our sacred sites along the way (Playa Vista, San Nicholas Island, Catalina Island, Helman Ranch, Bolsa Chica, Los Angeles Plaza, and most recently in San Gabriel). The State of California acknowledgment did not acknowledge "Tongva" – the State only acknowledged Gabrielino. Also, we question why these groups are complaining that we were the only Tribe contacted (located on page 35 of W15A-8-2018-report). How is that even possible when Soboba was a responding Tribe as well as us? It is their own deficiencies that they should place blame because they simply didn't respond in time and they have no direct lineal descendancy. They must be dismissed from consulting as a Tribal Government on this project and all projects pertaining to Native Americans.

We do NOT want a repeat of Banning Ranch – a site the "Tongva" / Jauneno who fought to "supposedly" to preserve the location by leaving it "as is"; a polluted, contaminated, oil filled which remains active with no opposition of approval of seventy additional oil wells. Also, these same individuals recently agreed to approve earth disruption and construction without any preliminary testing adjacent to the Banning Ranch site. This is a perfect example of the damage they have done and will continue to do as long as they can dupe agencies. CCC needs to vet these individuals for the protection of cultural resources, human remains as well as the protection of all lead agencies. At your request, our Tribal Government will provide our genealogy with lineal descendancy proof that you can use as a bench mark for vetting individuals in the process of consultation. We must emphasize that this is not an inter-tribal issue, this is an issue between the one true tribe and non-Native American Indians. Please find the attached letter from a certified genealogist Lorraine Escobar which repeats the concerns mentioned above.

It is of upmost importance to understand the incorrect involvement of the Juaneno. All authoritative anthropological sources and they themselves verify that their Tribal territory terminated on the north at Aliso Creek, some 15 miles to the south of Los Cerritos (i.e. Kroeber 1925, Johnston 1962, Bean and Smith 1978 and

Andrew Salas, Chairman

Nadine Salas, Vice-Chairman

Dr. Christina Swindall Martinez, secretary

Albert Perez, treasurer I

Martha Gonzalez Lemos, treasurer II

Richard Gradias, Chairman of the council of Elders

McCawley 1996). This sacred site is out of their traditional tribal territory and thus they should have no role in the decision-making process of this issue, nor play any role in consultations between themselves and the lead agency. Likewise, we would not interfere in business within their traditional tribal territory.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Salas', with a stylized flourish at the end.

Andrew Salas, Chairman
Gabrieleno Band of Mission Indians – Kizh Nation
(626)926-4131

Andrew Salas, Chairman
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

www.gabrielenobandmission.org

gabrielenoindians@yahoo.com



From the Office of Certified Genealogist & Researcher

Lorraine “Rain Cloud” Escobar, CGSM
Inam Mec Tanotc

June 26, 2018

Christina Snider, Executive Secretary
Native American Heritage Commission
1550 Harbor Blvd, Suite 100
West Sacramento, CA 95691

Re: Protesting an Impostor’s (Cindi Alvitre) challenge to Kizh Nation’s (aka Gabrieleño Band of Mission Indians) Rights to Protect the Sacred Sea of Kizh

Dear Ms. Snider,

I am writing you, at the request of Tribal Chairman Andrew Salas of the Gabrieleno Band of Mission Indians/Kizh Nation, and Dr. Gary Stickel, to protest Cindy Alvitre's destructive behavior against the true Native American people of the greater Los Angeles basin area. Dr. Stickel recently received a phone call from Julie Tamamait, one of your commissioners, informing him that Ms. Alvitre challenged the validity of your agency’s approval of the “Sacred Sea of Kizh.” As a certified genealogist, I have verified Ms. Alvitre as an impostor; she has absolutely no California Indian heritage whatsoever; therefore, she has no legal basis to make such a challenge. (If you wish to obtain a copy of that genealogical report, it was published on-line at http://gabrielenoindians.com/IMPOSTORS_files/CindiMAlvitreReport.pdf.)

Even though she has admitted that she is not a Gabrieleño Indian to Dr. Swindall, the Kizh Tribal Secretary, and has seen the evidence my research produced to prove she is not as she claims, Ms. Alvitre is well-known for continuing her bogus claim as being part of the “Gabrieleno-Tongva Tribe” in both academic and public arenas.¹ Perhaps you saw the LA Times where she boasted that she and her UCLA conspirators conducted the reburial of “the largest repatriation of Native American remains in California history.”² She has duped the NAGPRA Office and has violated the NAGPRA law which absolutely is intended for true Native Americans to repatriate their own ancestors’ burials and rebury them with all due respect and ceremony. Although she has not fooled the Office of

¹ The term *tongva* is a made-up word that gained recognition through mistakes and impostors. See “Why the Original Indian Tribe of the Greater Los Angeles Area is called Kizh not Tongva,” by E. Gary Stickel, Ph.D (UCLA). Photocopy enclosed.

² *LA Times*, California, Local: “Desecrated in macabre ways, the ancestral remains of Catalina’s Native Americans finally come home,” 22 Nov, 2017, by Louis Sahagun; <http://www.latimes.com/local/california/la-me-california-native-american-museums-20171122-story.html?outputType=amp>. Photocopy enclosed.

PO Box 579741, Modesto, CA 95357
Hm: (209) 524-6348 Cell: (209) 985-9282
InamMec@aol.com

Federal Acknowledgment, she has succeeded in fooling other agencies. Which why caution you she is working on fooling your agency through Julie Tamamait, one of your commissioners.

The Kizh have been laboring for many years to reclaim their history and reputation against more impostors than Ms. Alvitre. And, the Kizh have been making headway with the help with Dr. Stickel's most recent work, "Why the Original Indian Tribe of the Greater Los Angeles Area Is Called Kizh Not Tongva," which has received recognition from several L.A. cities, i.e. Newport Beach, Long Beach, Pomona, and Fontana. Although I have exposed several impostors, some of them, like Ms. Alvitre, keep finding ways to injure the authentic Kizh people. When we have so much refuting evidence, now available to the whole world, it is intolerable that any of these impostors are enabled to continue misappropriating the Kizh culture and their rights of inheritance.

Perhaps part of the blame should land on your commission as it is your historic policy to allow non-Indians to participate in repatriation in the event "they *might* represent other Indians." [Singleton, 2009] I am a Native American and the Vice-Chair of my tribe, The Esselen Tribe of Monterey County. And, as the genealogist who has helped thousands of California Indians verify their lineage, the very idea of an impostor usurping the rights of authentic California Indians is abhorrent and unthinkable. Let there be no doubt; ***It is cultural misappropriation.*** Instead of being part of the problem, I urge you to be part of the solution. Please, do not cater to Ms. Alvitre or the likes of others like her, Robert Dorame, Angie Doram-Behrns, Mark Acuña, Matt Lovio, John Lassos, Desiree Martinez, Emilio Reyes, Gloria Arellanes, and Anthony Morales. We have produced the burden of proof of what we say. Please, do your part and do not lend any credibility to these impostors.

All the Kizh People consider what Alvitre did as a horrible desecration of their ancestors' remains on a vast scale. I agree with their protest and make it my own as well. The number of non-Indian supporters are growing as well. We are all watching for your response to this violation against the people the laws were designed to protect.

Please respond to my request in writing on your letterhead by July 15.

Sincerely,

A handwritten signature in cursive script that reads "Lorraine Escobar".

Lorraine Escobar, Certified Genealogist,
Esselen Tribe of Monterey County Vice-Chair &
Tribal Genealogist

Enclosures: 2
C: Melanie O'Brien, National NAGPRA Program Manager
Dr. Gary Stickel

Charlene Nijmeh, Chairwoman, Muwekma Ohlone Tribe, and Rosemary Cambra
John Burch, Cultural Chair, Salinan Tribe of Monterey & San Luis Obispo Counties
Gary Pierce, Business Chair, Salinan Tribe of Monterey & San Luis Obispo Counties
Chris Lobo, Juañeno Band of Mission Indians
Tom Nason, Chairman, Esselen Tribe of Monterey County
Cari Herthel, Council Member, Esselen Tribe of Monterey County
Val Lopez, Amah-Mutsun Tribe



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Kate Huckelbridge
California Coastal Commission
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

Re: City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

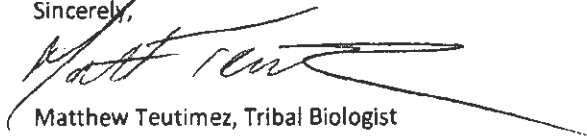
Dear Mrs. Huckelbridge and California Coastal Commission,

August 3, 2018

I am the Tribal Biologist of the governing body of the Gabrieleno Band of Mission Indians Kizh Nation and am writing to express mine and our Tribe's support for the Los Cerritos Wetland restoration project. I received both my Bachelor and Master of Science degrees at Cal State Long Beach (CSULB), where I was able to work with local endangered avian fauna within saltwater marsh ecosystems for Ridgeway's rail, California least tern, and Belding's savannah sparrow under Dr. Charles Collins of CSULB and Dr. John Bradley of US Fish & Wildlife Service (USFWS). As well, I participated in some of the early baseline surveys for Belding's Savannah sparrow under Richard Zembel at Los Cerritos wetland and other marshes in Orange, LA, and San Diego Counties. With these experiences, I have been able to observe and learn how these animals interact and use our saltwater environments, and what ecological elements are necessary for their persistence in a healthy saltwater marsh. Our Chief, Ernest Salas, favors restoration of this prestigious site and opposes any further drilling; he encourages that all wells, oil rigs, tanks, pipes, and auxiliary equipment be removed and be restored to better support the wildlife that still inhabit the wetland and also provide a beautiful location for the community to enjoy. Our chief charges our Tribe with the responsibility of being the voice for the plants and the animals of our land. Therefore, we combine our scientific knowledge with our Tribe's traditional knowledge to provide scientific and ancestral wisdom for the protection and preservation of our natural resources.

The current state of Los Cerritos wetland is shameful and is keeping this last remnant of the Los Cerritos wetland complex in peril. Without proper nurturing and enhancement efforts, the last remaining ecological functions of this land will be lost forever. These ecological functions are barely providing for breeding Belding's Savannah sparrows and foraging California Least terns, with no current support for Ridgeway's rails. These species are continually losing their struggle for space and food and the restoration of this wetland area will only be a positive boost for the enrichment of their foraging and breeding areas. Our Tribe has committed to the City of Long Beach, the Los Cerritos Land Trust, and the Beach Oil Mineral Partners, that we will join them in the mutual commitment to regain and enhance the ecological functions of Los Cerritos wetlands. We believe this desire is in line with the Coastal Commission staff's recommended modifications in the staff report and we too support these modifications. We are capable and more than willing to help in this endeavor and encourage the Coastal Commission to certify the LCP Amendment Request No. 1-18 with the staff suggested modifications.

Sincerely,


Matthew Teutimez, Tribal Biologist
Gabrieleno Band of Mission Indians – Kizh Nation
(844) 521-5827

Andrew Salas, Chairman
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

www.gabrielenoindians@yahoo.com

gabrielenoindians@yahoo.com

SUBJECT: W15a staff report regarding City of Long Beach Local Coastal Program (LCP) Amendment Request No. 1-18 (LCP-5-LOB-18-0026).

W15a staff report regarding City of Long Beach Local Coastal Program (LCP) Amendment Request No. 1-18 (LCP-5-LOB-18-0026) includes the following information.

1. All Coastal Commission rulings must follow the California Coastal Act
2. While the Coastal Act does not acknowledge tribal culture/cultural resources, Coastal Act Sec 30244 does acknowledge protection for archaeological resources as follows: "Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required."
3. The staff report cites Coastal Act Sec 30244 when referencing the need to protect tribal cultural resources with respect to City of Long Beach Local Coastal Program (LCP) Amendment Request No. 1-18 (LCP-5-LOB-18-0026)
4. Staff acknowledges evidence of significant archaeological and tribal cultural resources in the SEADIP area and their cultural significance to several tribes
5. Staff acknowledges that new oil development and potential oil spills could cause harm to and/or destruction of these resources
6. Staff acknowledges that "there is extensive evidence that the entire SEADIP area is sensitive for paleontological, archeological and tribal resources, potentially including Sacred Lands, Tribal Cultural Landscapes and Traditional Cultural Property, designated as Native American resources by the Native American Heritage Commission"
7. Staff states that "the City's proposed amendment does not include any policies protecting cultural, archeological or tribal resources. Without these protections, new oil development proposed under the LCP, if amended as proposed by the City, could lead to the destruction or harm of tribal, archeological and other cultural resources, which is inconsistent with Section 30244 of the Coastal Act."
8. Staff states that some "tribal members described the entire SEADIP area as a significant tribal cultural landscape and raised concerns that proposed oil and gas production activities would adversely impact sacred sites and ancestral remains."
9. Staff suggest Modifications to the LUP: SEADIP as follows:

SUBJECT: W15a staff report regarding City of Long Beach Local Coastal Program (LCP) Amendment Request No. 1-18 (LCP-5-LOB-18-0026).

“All development that would adversely impact archaeological or paleontological resources shall include reasonable mitigation measures.”

10. Staff suggest Modifications to IP:SEADIP and City Oil Code as follows:

- a) an analysis of impacts to archaeological and tribal cultural resources
- b) an investigation to see if there are any archaeological/tribal cultural resources in the project area
- c) monitoring and mitigation plans to determine how project will avoid or minimize impacts

11. Staff concludes that that if modified as suggested:

- a) no significant adverse impacts to coastal resources will result from the LCP Amendment.
- b) the amendment does not have the potential to result in significant individual or cumulative impacts to coastal resources protected by the Coastal Act.
- c) there are no further feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the amendment may have on the environment.
- d) the proposed LCP amendment is consistent with the California Environmental Quality Act

We do not reach the same conclusions as staff re 10 a,b,c or d and cannot support a vote to approve Long Beach Local Coastal Program (LCP) Amendment Request No. 1-18 (LCP-5-LOB-18-0026) with Modifications

While the Coastal Act does not prohibit adverse impacts to archaeological resources it does require “reasonable” mitigation. We would argue that, in this case, there is no “reasonable” mitigation for the “taking” of Sacred Lands, Tribal Cultural Landscapes and Traditional Cultural Property. The staff report states that “tribal members described the entire SEADIP area as a significant tribal cultural landscape and raised concerns that proposed oil and gas production activities would adversely impact sacred sites and ancestral remains.” The report also acknowledges the City’s stated intent to amend SEADIP to comply with a new oil drilling project that the City has already approved, over the objections of these same tribal members. Not mentioned in the staff report is that the City has also approved a new LCP/SEASP which includes the proposed amendment, over the objections of these same tribal members and local residents.

- Given the fact that the oil production facilities proposed for both the LCWA and Pumpkin Patch sites will completely alter the surface areas and allow for toxic chemicals to be used and stored on these sites,

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- Given that these drilling operations will extend for miles under the Los Cerritos Wetlands and beyond and include the extraction and re-injection of millions of gallons of water,
- Given the fact that the construction of massive new storage tanks, pipelines, a methane burn off tower, and a multi-story office building on these sites will disrupt, damage, and destroy wildlife and habitat
- Given the fact that the operation of these or any new oil facilities will extend the life and massively increase the volume of fossil fuel extraction from the SEADIP area, pollute the air and water, and involve oil spills, possibly on a scale that cannot be contained
- Given the fact that fossil fuels contribute to global warming and sea level rise

we conclude that all of the above are to be sacrificed in order to “promote” new oil drilling operations in the Coastal zone, in and adjacent to the Los Cerritos Wetlands, over and adjacent to the Newport Inglewood Fault, in an area subject to liquefaction, in an urban area (SEASIP proposes housing for 4000 new residents along the edge of Los Cerritos Wetlands (on PCH from the Pumpkin Patch to Loynes Dr).

It is standard practice for “archeological resources” already known or unearthed on sites being “developed” to be “mitigated” by being removed, analyzed, and stored. The extent of this mitigation is dependent to a large degree on their value to science, the size of the project, and the developer’s budget. Only a portion of these “resources” are “saved,” the majority of sites are disposable. Sites that can provide “new” scientific information may be “investigated” more thoroughly than those that do not. The “evidence” may be studied and someday seen in a museum display, the “site” is recorded but no longer exists.

These mitigations, even when observed by tribal monitors, are not adequate, or even relevant to Sacred Lands, Tribal Cultural Landscapes or Traditional Cultural Properties. Place is central to the identity and continued existence of tribal peoples. The history, the health, the future of tribal peoples is rooted in the connection to specific lands and waters. The relationship is one of stewardship, not of exploitation or extraction of resources. To remove is to disconnect the people from the land, to destroy the evidence and erase the tribal history of the land, and to devalue the meaning it holds for present and future generations. While Sacred Lands, Tribal Cultural Landscapes and Traditional Cultural Properties are compatible with many human activities, “promoting” oil extraction within the Coastal Zone, violates the tribal connection to and responsibility for these homelands. For California’s tribal nations, so much has been lost it is imperative to preserve what little remains. Speaking directly

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to Coastal Commission staff member Kate Hucklebridge, Chief Anthony Morales, Gabrielino/Tongva, San Gabriel Band of Mission Indians voiced his opposition to the proposed amendment to the LCP. Chief Morales raised concerns that proposed oil and gas production activities would adversely impact sacred sites and ancestral remains by calling them “genocide.”

The proposed “reasonable” mitigation measures are inadequate

- an analysis of impacts to archaeological and tribal cultural resources
- an investigation to see if there are any in project area
- monitoring and mitigation plan to determine how project will avoid or minimize impacts

Further analysis and investigation is not required to determine that the Los Cerritos Wetlands and the project area are Sacred Lands, Tribal Cultural Landscapes and Traditional Cultural Properties. Numerous archaeological surveys have unearthed evidence of human habitation including a burial ground. Historic records prove the occupation of the area for tens of thousands of years. Also well documented is the current use of the area by tribal peoples, and years of tribal resistance to developments that would degrade and destroy this Sacred Land, Tribal Cultural Landscape and Traditional Cultural Property within the Los Cerritos Wetlands and surrounding areas.

While not without merit, the proposed investigations, analysis, and monitoring/mitigation plans (all contingent on who does the work and who foots the bill), rely on a particular methodology, conducted by “experts,” to determine both the value and the fate of a Sacred Land, a Tribal Cultural Landscape and a Traditional Cultural Property. To continue to seek “proof,” to “see if there are any tribal cultural resources in the project area,” to make monitoring and mitigation plans for “minimizing” impacts may yield additional information but also damages and destroy what remains. There is no lack of evidence, there is simply the refusal to listen to and acknowledge tribal opposition, tribal history, tribal knowledge, and tribal identity. This denial is, in and of itself, a form of environmental racism and a perpetuation of the conquest of the tribal lands of California Indian peoples.

Coastal Commission staff has prioritized the request of the City of Long Beach to amend its Local Coastal Program in order to further “the project” and to expand oil drilling in the Coastal Zone over the objections of tribal peoples and the obligation to protect coastal resources, including tribal cultural resources. Staff concludes that that if modified as suggested that

- a) no significant adverse impacts to coastal resources will result from the LCP Amendment.
- b) the amendment does not have the potential to result in significant individual or cumulative impacts to coastal resources protected by the Coastal Act.

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- b) there are no further feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the amendment may have on the environment.
- c) the proposed LCP amendment is consistent with the California Environmental Quality Act

We disagree and find that the above modifications violate the Coastal Act because they prioritizes coastal development at the expense of coastal resources. Guiding Principals of the Tribal Consultation Policy have not been adhered to,

“The Commission seeks to establish and maintain a respectful and effective means of communicating and consulting with Tribes and will seek in good faith to: treat the resource(s) with culturally appropriate dignity by taking into account the tribal cultural values and meaning of the resource to the consulting California Native American Tribe”. We not believe that staff has fully taken into account the tribal cultural values and meaning of this resource to the California Native American Tribes they have consulted with and to those having a legitimate connection to the area.

While there is no “feasible mitigation” there are any number of “feasible alternatives”. The “no amendment, no project” alternative is only briefly touched on in the staff report which references current oil operations vs. their proposed “expansion.” Other than this massive increase in oil extraction, no alternatives to the status quo of degraded, poorly maintained, and apparently unprofitable oil operations now sited on existing wetlands, are proposed by the property owners - including the LCWA, Synergy LLC, Lyons Properties, and the City of Long Beach, or by Coastal Commission staff.

There is no acknowledgement that the Pumpkin Patch is historically a Least Tern nesting site and ESHA habitat, less so currently, having be scraped clean by heavy equipment, occupied by abandoned motor homes, parked cars, and seasonal sales of strawberries, pumpkins and Christmas trees. Not mentioned is the fact that the LCWA’s original wetlands restoration plan included a visitors center and wildlife corridor on the property to be amended and used for new oil drilling operations. Previously, Los Cerritos Wetlands properties in private hands have been traded for public properties more suitable for development or simply purchased outright. Wetlands protection and restoration is ongoing, enjoys public and private support, and is not contingent on the expansion of oil drilling operations. One of the most commonly stated objections to the proposed amendments and project was that “wetlands restoration” relied on new and expanded oil drilling operations. Rather than holding polluters accountable, the wetlands were being held hostage to the same industry that had destroyed them in the first place and would do so again.

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We also object to granting the requested Amendment to the City of Long on the grounds that public outreach on the part of the developers (BOMP and the LCWA) and the City of Long Beach has not been conducted as required by the Coastal Act, "The Commission must make recommendations to state and local agencies to ensure effective public participation in their coastal resources management decisions (PRC 30006 and 30339." The majority of public meetings, tours of the some of the project area, social media, and recruiting of community and environmental organizations has been conducted by BOMP and/or its consultants who have focused on the "benefits" of proposed "wetlands restoration" while denying or ignoring the costs and risks of the project to public health, the environment, and tribal resources. If such outreach fails to inform the public of the facts, while simultaneously promoting the developer's agenda, then it does not "ensure effective public participation in coastal resource management decisions." So far, 700 community members have signed our petition to oppose the Los Cerritos Wetlands Restoration and Oil Consolidation Project, and the land exchange between the LCWA and Beach Oil Minerals Partners on the grounds that the project would allow for oil drilling beneath the Los Cerritos Wetlands, the disruption and destruction of wildlife habitat and Native American sites.

In conclusion, we respectfully ask that the Commissioners deny City of Long Beach Local Coastal Program (LCP) Amendment Request No. 1-18 (LCP-5-LOB-18-0026).

Rebecca Robles, Anna Christensen, Tahesha Knapp-Christensen
Board of Directors
Protect the Long Beach/Los Cerritos Wetlands

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

We, the undersigned, oppose the Los Cerritos Wetlands Restoration and Oil Consolidation Project. We demand that the Los Cerritos Wetlands Authority withdraw from a land exchange with Beach Oil Mineral Partners which would allow for oil drilling beneath the Los Cerritos Wetlands, the disruption and destruction of wildlife habitat and Native American sites

Print full name	Signature	Zip code
1 KIMBERLY WALTERS		90807
2 KRISHNA CHAITANYA		90807
3 SANDRA REYES		90716
4 Luis Rios		90716
5 Jessica Heinick		90716
6 Janice Sampson		90815
7 April Hawley		90740
8 Victor Hernandez		90249
9 Christina McCann		90808
10 Tatiana Sanchez		91506
11 Natalie Weeks O'Neil		90503
12 Art Lee		91304
13 RITA BANDZIVILIS		90804
14 Genelle Palacio		90808
15 Monica Hernandez		90044
16 Stephanie Madrigal		90745
17 Anthony Huichan		93065
18 Richard Padilla		90630
19 Eilene Vasquez		91755
20 Valerie Morrow		90814
21 Cesar Perez		91501
22 Angree Teachout		92284
23 Angela Stephens		91775
24 Fernando Gallegos		90242
25 Consuelo Hallax		90804

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	Print full name	Signature	Zip code
1	Lorraine L. Lewis	Lorraine L. Lewis	92867
2	Donirvin Diekerson	Donirvin Diekerson	90714
3	Jacqueline Mixon	Jacqueline Mixon	90201
4	Miguel SANDOVAL	Miguel Sandoval	90201
5	Louis LEONARD	Louis Leonard	93545
6	Anna Chanvechist	Anna Chanvechist	92374
7	Iris Hallax	Iris Hallax	90804
8	CYNTHIA NESKANI	Cynthia Neskani	92505
9	Trinity Neskani	Trinity Neskani	86440
10	DAMIAN VANFLEET	DAMIAN VANFLEET	92503
11	Dominic GARCIA	Dominic Garcia	92407
12	Miguel Cerrantes	Miguel Cerrantes	92338
13	KARA MACHADO	KARA MACHADO	91740
14	WILL MASON	WILL MASON	91740
15	Lesette Rodriguez	Lesette Rodriguez	90813
16	Cecilia Velazquez	Cecilia Velazquez	90713
17	NORM ROBBISS	NORM ROBBISS	91941
18	Karen Kerwin	Karen Kerwin	92673
19	STEPHEN LOMA	Stephen Loma	92672
20	Tamie Glidden	Tamie Glidden	96161
21	Cindy Marquez	Cindy Marquez	92672
22	Sylvia VALENTIN	Sylvia Valentin	90802
23	Meghan Vengump	Meghan Vengump	90031
24	Samantha Winters	Samantha Winters	90065
25	ZACHEL WHITT	ZACHEL WHITT	92630

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

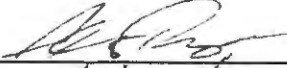
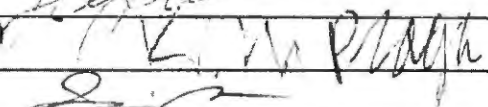
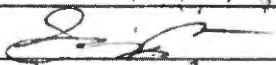
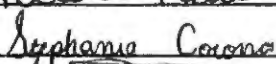
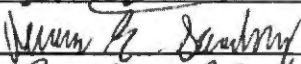
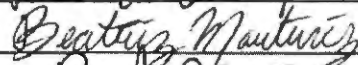
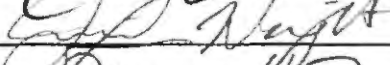
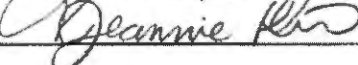
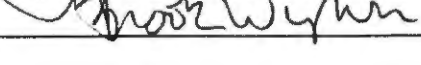
We, the undersigned, oppose the Los Cerritos Wetlands Restoration and Oil Consolidation Project. We demand that the Los Cerritos Wetlands Authority withdraw from a land exchange with Beach Oil Mineral Partners which would allow for oil drilling beneath the Los Cerritos Wetlands, the disruption and destruction of wildlife habitat and Native American sites

	Print full name	Signature	Zip code
1	Jacqueline Parke	Jacqueline Parke	92637
2	Thokai Nguyen	Thokai Nguyen	92647
3	Aaron Taylor	Aaron Taylor	92106
4	Rehelle Gedra	Rehelle Gedra	90804
5	Melissa Mejia	Melissa Mejia	90810
6	Joe Scarpa	Joe Scarpa	90803
7	Rinda Boll	Rinda Boll	90713
8	Norberto Lopez	Norberto Lopez	90047
9	BERNICE JIMENEZ	Bernice Jimenez	90802
10	Heather Dollas	Heather Dollas	90802
11	Lara Chao	Lara Chao	90102
12	Silvia Conti	Silvia Conti	90803
13	Maximillian Munguia	Maximillian Munguia	90802
14	Ofelia Ruiz	Ofelia Ruiz	90802
15	Karen S Harper	Karen S Harper	90803
16	Anna Hunt	Anna Hunt	90813
17	Autumn Smith	Autumn Smith	90813
18	Lynne Schuk	Lynne Schuk	90803
19	William Hinkley	William Hinkley	90813
20	Jesus Nobst	Jesus Nobst	90710
21	Fred Jensen	Fred Jensen	90815
22	Sandra Zoldi-Reich	Sandra Zoldi-Reich	90803
23	Ang Montooth	Ang Montooth	90808
24	ANNE MARIE JAO	ANNE MARIE JAO	90745
25	Uha Duong	Uha Duong	92870

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Petition to protect the Los Cerritos Wetlands from expanded oil drilling

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#	Print full name	Signature	Zip code
1	Alexander Rose		90403
2	Malik Lirio		90803
3	KIARRA VROGLIO		90803
4	Gary Mai		90803
5	Kristi Kawabe		92663
6	Stephanie Corona		90222
7	Albert Morabos		90505
8	Ivan Sanchez		92648
9	Beatriz Martinez		90670
10	Bianca Hernandez		90706
11	Steven Miller		90707
12	Gabriella Reynoso		90804
13	Sue Lee		90630
14	Javier Rodriguez		92614
15	Becca Gillenwater		92046
16	Lineth Antino		90746
17	Esperanza Oregel		90247
18	Carlos Gutierrez		90660
19	Jennifer Wright		90103
20	Deanne Kim		90720
21	Chun Ma		90804
22	Cynthia Haborimana		90804
23	Miles Brayard		90803
24	Linda Patterson Salib		90066
25	Brook Wynn		90810

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

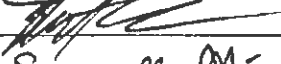
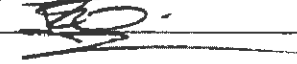
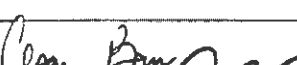
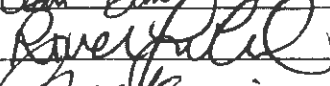
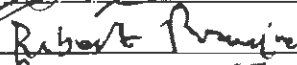
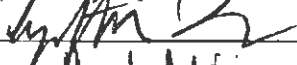
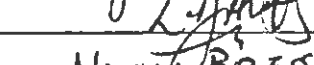
We, the undersigned, oppose the Los Cerritos Wetlands Restoration and Oil Consolidation Project. We demand that the Los Cerritos Wetlands Authority withdraw from a land exchange with Beach Oil Mineral Partners which would allow for oil drilling beneath the Los Cerritos Wetlands, the disruption and destruction of wildlife habitat and Native American sites

	Print full name	Signature	Zip code
1	Trevor Robinson		90808
2	Willow Parks		90806
3	Beth Glancy		92869
4	David P. G.		92036
5	MARIO LESZCZAK		91780
6	Robert Augustine		21811
7	Ann Augustine		21811
8	Roslie Gallagher		82520
9	DANIEL P. GALLAGHER		82520
10	Gita Sathianathan		92603
11	Shirley Sathianathan		92603
12	Deborah Parker Helmick D.L.P.H.		92651
13	Marc Bucccheri		92661
14	Stacy Ownbey		92660
15	Mary Kyle		92646
16	Linda Rushing		92651
17	JAMES Rushing		92651
18	Kathleen Trester		92617
19	Nancy Curtis		92649
20	Michelle Gross		92625
21	Ray Neufeld		92651
22	Ardis Reynolds		92622
23	Judie Mancuso		92651
24	Char McEASH		92604
25	Ginny Kistler		92677

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

We, the undersigned, oppose the Los Cerritos Wetlands Restoration and Oil Consolidation Project. We demand that the Los Cerritos Wetlands Authority withdraw from a land exchange with Beach Oil Mineral Partners which would allow for oil drilling beneath the Los Cerritos Wetlands, the disruption and destruction of wildlife habitat and Native American sites

	Print full name	Signature	Zip code
1	Roger Britan		92683
2	VICTORIA AGUILERA		90670
3	Christina Maldonado		90280
4	Xilamun Rios		90280
5	Robert Flores		90803
6	Samantha Marino	Samantha Marino	90732
7	Roy Escoto		90760
8	Charlotte Jura		90301
9	Cesar Matute	Cesar Matute	90024
10	River Freebird		90024
11	Ann Kim		90802
12	Tania Martinez		92805
13	Jacqueline		90864
14		Robert Ramirez	93030
15		Cynthia Torres	93030
16	Axel Mejia		90501
17	Megan Dury		90600
18	Dale Pelagosa		90604
19	NELL H BROWN	NELL H BROWN	90814
20	Jennifer Moreno		90650
21	LEIGHANNE JAVIER		90027
22	Nancy Brunel	Nancy Brunel	90814
23	ANNA JONES	ANNA JONES	91601
24	Cheryl Phoenix		90808
25	Yassir Paz		90805

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

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	Print full name	Signature	Zip code
1	Malila Holman		90814
2	DERALD TUCKER		90804
3	Lexi Saenz		90603
4	Leen Almahdi		90815
5	Jon Valdez		90239
6	STELLA ALVEDO		90804
7	Phillip Jones-Thomas		90814
8	Stephen Haridon		90814
9	Karen Chavez		95020
10	Akira Aeno		90021
11	LEETLE CROW		90815
12	Yoyo Negrete		90620
13	Miranda Wichum		91203
14	JERRY KEE		90201
15	Christian McAmor		90037
16	Cecilia Perez		90250
17	Josaf Rittenberg		95117
18	Brett Gordon		89074
19	Bobby		91023
20	TRISTAN GORDON		90805
21	Jonathan Penabazquez		94501
22	SUSAN A. IJIMA		90037
23	Sydney Williams		91748
24	Peter Sanchez		
25	Brandon Goodarian		92683

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

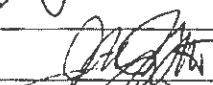
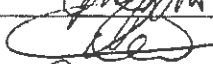
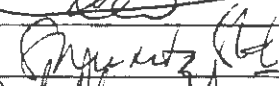
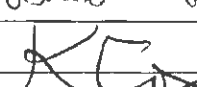
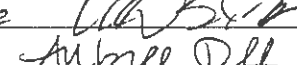
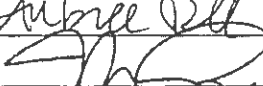
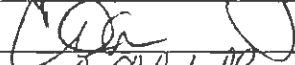
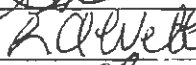
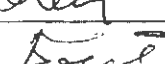
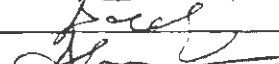
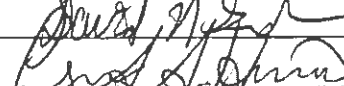
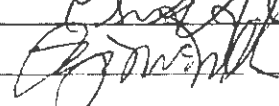
We, the undersigned, oppose the Los Cerritos Wetlands Restoration and Oil Consolidation Project. We demand that the Los Cerritos Wetlands Authority withdraw from a land exchange with Beach Oil Mineral Partners which would allow for oil drilling beneath the Los Cerritos Wetlands, the disruption and destruction of wildlife habitat and Native American sites

	Print full name	Signature	Zip code
1	Benjamin Chao		90805
2	Jordan Wynne		90807
3	Anabel Martinez		91343
4	Annie Chow		90027
5	Clayton Head		90740
6	Danion Gokeg		90810
7	Matthew Wheeler		90810
8	Mackenzie Hanrahan		93003
9	Eric Foster		
10	Bryan Doumenc		93003
11	Jorge Carlos Anaya		90744
12	Michael W. Jordan Sr		91016
13	Rishmuni		90603
14	Lyanna Rodriguez		90650
15	Dana R Hopfen		90808
16	Yenesis Medina		90807
17	Shelley		90241
18	Eric Riske		90804
19	Javier Crespo		90721
20	Ana De la Torre		90806
21	Francisco Pinto		92707
22	Dennis Beeten		90220
23	Sergio Resendez		90011
24	John Henderson		90011
25	LITTLE CROW		

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

We, the undersigned, oppose the Los Cerritos Wetlands Restoration and Oil Consolidation Project. We demand that the Los Cerritos Wetlands Authority withdraw from a land exchange with Beach Oil Mineral Partners which would allow for oil drilling beneath the Los Cerritos Wetlands, the disruption and destruction of wildlife habitat and Native American sites

	Print full name	Signature	Zip code
1	Paula Abad		90813
2	MARJORIE ROBERTSON		90803
3	DAVID STEELE		90755
4	Shirley Stule		90755
5	Phil Giesen		90814
6	Carol Quintan		90815
7	Barbara Muskulin		90814
8	Kristen Cox		90808
9	Wayne Marchysky		90807
10	GEORGE AD BLAZE		90813
11	Aubree Dodd		90815
12	Nathalie Piek		90801
13	Christen Dralce		92804
14	Veronica Legarreta		90802
15	CLAUDIA BRYANO		90650
16	Lucie Webb		92627
17	Jaden Wyszowski		90804
18	David Bueno		90713
19	Aaron Flam		92603
20	Dominick Martinez		90804
21	Alejandro Ramos		90815
22	DANIEL PIERCE		90804
23	DAVE GUTMAN		90037
24	Christin Hansen		92867
25	Ryan McMillan		90815

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Petition to protect the Los Cerritos Wetlands from expanded oil drilling

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	Print full name	Signature	Zip code
1	Tamara Romero	Tamara	90814
2	JOEY OLIVAS	Joey Olivas	90744
3	Anna Johnson	Anna Johnson	92845
4	Alicia Cox	Alicia Cox	90803
5	Guillermo Alvarez	Guillermo Alvarez	90805
6	Travis Swans	Travis Swans	20804
7	Rich Shimizu	Rich Shimizu	90810
8	Paul Nesbit	Paul Nesbit	92845
9	Elsa Nesbit	Elsa Nesbit	92845
10	Shannel Pittman	Shannel Pittman	90003
11	TIVA LIM	Tiva Lim	90315
12	Vanessa Azota	Vanessa Azota	90806
13	Trevor Magaña	Trevor Magaña	92627
14	Connel H	Connel H	90751
15	BODECK H	Bodeck H	90804
16	R G Wong	R G Wong	90503
17	Rose Lohm	Rose Lohm	90802
18	James Kucuk	James Kucuk	90802
19	Tina Trubish	Tina Trubish	90803
20	Marcella Stevenson	Marcella Stevenson	90404
21	Angelica Sierra	Angelica Sierra	90804
22	Arielyn Blake	Arielyn Blake	92880
23	JULIAN MONTECROSSO	Julian Montecrosso	90505
24	LAUREN TURCO	Lauren Turco	90266
25	Samuel Pina	Samuel Pina	90806

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Petition to protect the Los Cerritos Wetlands from expanded oil drilling

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	Print full name	Signature	Zip code
1	Malerie Martin	Malerie Martin	90804
2	Robert Tress	Robert Tress	90804
3	DALE WEST	Dale West	90803
4	Theresa Perez	Theresa Perez	90745
5	Deborah Shahbani	Deborah Shahbani	90803
6	PRINCE GONZALEZ	Prince Gonzalez	90755
7	JOAN MATHEWS	Joan Mathews	90814
8	LESLEY HAWKI	Lesley Hawki	90803
9	Lenora M. Sanchez	Lenora M. Sanchez	92649
10	Suzanne Baez	Suzanne Baez	90806
11	Nancy Billings	Nancy Billings	90803
12	Julia Arner	Julia Arner	90814
13	Maggie Larkin	Maggie Larkin	90803
14	Angelina Glomb	Angelina Glomb	90620
15	Jenelle Estrella	Jenelle Estrella	90740
16	Alana Citarich	Alana Citarich	90814
17	JEAN T. DENNIS	Jean T. Dennis	90740
18	Donna Guizeli	Donna Guizeli	90720
19	Anthony Scudato	Anthony Scudato	90814
20	Michael Wanschoek	Michael Wanschoek	90703
21	Danielle Cohn	Danielle Cohn	90808
22	Bryce Wanschoek	Bryce Wanschoek	90814
23	David Hernandez	David Hernandez	90802
24	Winston Delaurier	Winston Delaurier	90803
25	Michael Porter	Michael Porter	90802

1/3/18

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

We, the undersigned, oppose the Los Cerritos Wetlands Restoration and Oil Consolidation Project. We demand that the Los Cerritos Wetlands Authority withdraw from a land exchange with Beach Oil Mineral Partners which would allow for oil drilling beneath the Los Cerritos Wetlands, the disruption and destruction of wildlife habitat and Native American sites

	Print full name	Signature	Zip code
1	HARLAN T ALLEN	[Signature]	90803
2	NICOLE SEYMOUR	[Signature]	90802
3	Lily House-Peters	[Signature]	90803
4	Tiffany Semoy Davy	[Signature]	90802
5	Eunice R Vera	[Signature]	90815
6	Victor Jimenez	Victor Jimenez	90815
7	Jacen King	[Signature]	90303
8	Megan Magiera	[Signature]	90813
9	Alyssa Gomez	[Signature]	90706
10	David Biludun	[Signature]	90802
11	Elizabeth Williams Elizabeth Williams	[Signature]	92804
12	William Amorelli	[Signature]	90802
13	Elizabeth Sarkisian	Elizabeth Sarkisian	90802
14	Tamisha Brown	[Signature]	90802
15	NICK PODUE	[Signature]	90815
16	AIA WHITE-PODUE	Aia White-Podue	90815
17	Elizabeth Tholl	[Signature]	90803
18	Rita Powell	[Signature]	90807
19	JACK ENCIBOR	[Signature]	90713
20	Audrey Wong	[Signature]	90803
21	David Sobolewski	[Signature]	92651
22	Mary Ann Giller	[Signature]	90712
23	Tabitha Filan	Tabitha Filan	92672
24	SHAMUS	[Signature]	92651
25	SHAMUS	[Signature]	92651

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

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	Print full name	Signature	Zip code
1	Lisa Mouren-Lauren's	Lisa Mouren-Lauren's	92647
2	Sara Hernandez	Sara Hernandez	90241
3	PATRICIA L. WINTERS	Patricia L. Winters	90814
4	Sarah Westbrook	Sarah Westbrook	90803
5	SUNDANCE Földi-Rosch	Sundance Földi-Rosch	90803
6	Amy Montooth	Amy Montooth	90808
7	Cheryl Sullivan	Cheryl Sullivan	90805
8	Renee Be Wile	Renee Be Wile	90815
9	Greg Shea	Greg Shea	90815
10	Chris Bautista	Chris Bautista	90503
11	Cristina Fuentes	Cristina Fuentes	90806
12	Ah Roxaneybaile	Ah Roxaneybaile	90711
13	Jamie Vazquez Koon	Jamie Vazquez Koon	90755
14	Kristy Gladysz	Kristy Gladysz	92845
15	Mai Duong	Mai Duong	90803
16	Ryan Hawkins	Ryan Hawkins	90815
17	MARTIN GATES	Martin Gates	92625
18	Gayle Knapp	Gayle Knapp	90740
19	Sally Hirsch	Sally Hirsch	90740
20	Shannon Pluma	Shannon Pluma	90805
21	Renee Paulsin	Renee Paulsin	92544
22	Brenda Deluna	Brenda Deluna	92543
23	Marianne Cole	Marianne Cole	90814
24	Janet L. Jones	Janet L. Jones	90814
25			

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

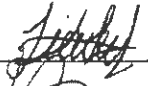
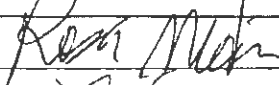
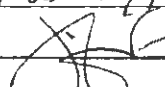
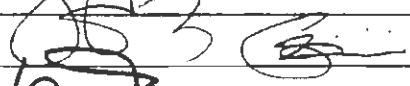
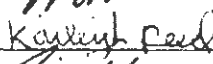
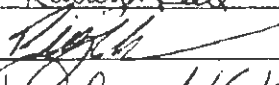
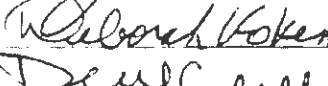
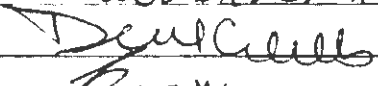
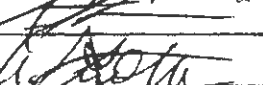
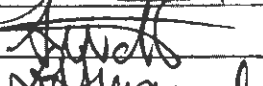
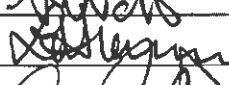
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	Print full name	Signature	Zip code
1	Shelly Gail Nieblas	Shelly Gail Nieblas	92672
2	Belinda Tuny	[Signature]	90041
3	Tiffany Keman	[Signature]	92673
4	NATHAN PEARSON	[Signature]	92673
5	Ami Admire	Ami Admire	92082
6	Lois Blair	Lois Blair	92672
7	Heather Rice	Heather Rice	92672
8	Leslie Boulton	[Signature]	92672
9	Lynne Stiel	Lynne Stiel	49067
10	Marian Tolson	Marian Tolson	92672
11	Kurt Sanchez	Kurt Sanchez	10315
12	Robert Balcer	[Signature]	92672
13	MARCO ZERMENO	[Signature]	90065
14	Sabrina Resvaloso	[Signature]	872583
15	David Salinas	[Signature]	92807
16	Nancy Smith	Nancy Smith	90638
17	Jeanine Jans	[Signature]	91786
18	ERIC ESPINOZA	[Signature]	91789
19	Lillian Espino	[Signature]	91789
20	Kathy Hartl	[Signature]	92672
21	Phil Giesen	Phillip Giesen	90814
22	Ryan Park	Ryan Park	90503
23	MariaMazon Costa	MariaMazon Costa	90803
24	Vaniga KESSLER	J. KESSLER	90803
25	JOCK (Charvat) Bick	Charvat Bick	90803

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

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	Print full name	Signature	Zip code
1	Sandra Jimenez		90804
2	Heidi Yon		90277
3	MARK FLO Marin		90713
4	Rosa Meda		90713
5	Jennifer Velasquez		90602
6	Samuel Pina		
7	Eddie Rash		90815
8	Nicholas Gonzalez		90814
9	Dan Chery		90814
10	Matt Goldman		90815
11	Kaileigh Reed		90814
12	Diego Artiga		92647
13	Deborah Koken		92627
14	Deborah Ceballos		92648
15	Troy Johnson		92648
16	Anthony Quirez		92648
17	Eva G. Sinotte		91355
18	John Strath		92646
19	Danielle Smith		92706
20	George Bernal		92706
21	Joseph Quintero		92331
22	Chuck Hensell		92646
23	Stewart Watts		92692
24	Laura Hammond		92646
25	Jeff Cochran		92646

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	Print full name	Signature	Zip code
1	LINDA SOUTHWELL	Linda Southwell	92653
2	Lisa Marvel	Lisa Marvel	92543
3	Mike Evans	Mike Evans	91710
4	Barbara Watters	Barbara Watters	90605
5	Jacob J. Lorele	Jacob J. Lorele	92672
6	Douglas Poland	Douglas Poland	92672
7	Noel Moore	Noel Moore	92629
8	ROSS PLESSER	ROSS PLESSER	90039
9	Ariandam Sinharay	Ariandam Sinharay	92672
10	Larry Culbertson	Larry Culbertson	92672
11	GABRIEL SALINAS	Gabriel Salinas	92816
12	Ty Daniel Jensen	Ty Daniel Jensen	92672
13	Jessica Culbertson	Jessica Culbertson	91331
14	HONOR CALDERON	HONOR CALDERON	91931
15	Jerre Campbell	Jerre Campbell	92220
16	MARIA STEVENSON	MARIA STEVENSON	90405
17	STEVEN COHEN	STEVEN COHEN	90746
18	Julie Charvat	Julie Charvat	90808
19	Dokha Uy	Dokha Uy	90805
20	DACE WILKINSON	DACE WILKINSON	90814
21	Jennifer Grandell	Jennifer Grandell	91506
22	Andrea Hopton	Andrea Hopton	90803
23	Suzette Mohler	Suzette Mohler	90803
24	Luis Santiago	Luis Santiago	90803
25	Belle Watkins	Belle Watkins	91786

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

We, the undersigned, oppose the Los Cerritos Wetlands Restoration and Oil Consolidation Project. We demand that the Los Cerritos Wetlands Authority withdraw from a land exchange with Beach Oil Mineral Partners which would allow for oil drilling beneath the Los Cerritos Wetlands, the disruption and destruction of wildlife habitat and Native American sites

	Print full name	Signature	Zip code
1	Melissa Flores	[Signature]	90292
2	Steve Chavez	[Signature]	95020
3	Michael Parker	[Signature]	90013
4	Steve Torres	[Signature]	90808
5	Guineo Canales	[Signature]	90803
6	KATHRYN MARI	[Signature]	92807
7	Bobby Joe Martinez	[Signature]	
8	Lionel Gonzalez	[Signature]	90807
9	Cecilia Felix	[Signature]	90807
10	Lizbeth Roque	[Signature]	90255
11	Andy Espinoza	[Signature]	90202
12	Margie Sevilla	[Signature]	91331
13	Martin Lopez	[Signature]	90037
14	Andres Medina	[Signature]	91342
15	Todd Mahuke	[Signature]	93401
16	Cheryl Mahuke	[Signature]	93401
17	Tevesa Trillo	[Signature]	96241
18	ASHLEY HECHANOVA	[Signature]	92780/90815
19	ROBERT LEE	[Signature]	90815
20	Dawn Southern	[Signature]	90740
21	Audrey Wong	[Signature]	90503
22	Andy M	[Signature]	90804
23	Marlo L.	[Signature]	90650
24	Riley E	[Signature]	90650
25	Julia Howell	[Signature]	90808

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

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	Print full name	Signature	Zip code
1	Kimberly Navas		90813
2	KATH MENEZES		90630
3	Josie Knott		90630
4	Kyra Meredith		90623
5	Robert Franco		90805
6	Marlene Apalaca		91646
7	Steven Trujillo		92845
8	Bree Esparza		92672
9	Randall Hartman		92683
10	Veta Moore		99902
11	STEVE MARTIN		92648
12	Michelle Gutierrez		91709
13	Rebecca Pfeifer		92626
14	Wilson Wang		92821
15	Melanie Ventresca		92562
16	Udo Von Zabersberg		92562
17	Bretney Lugo		92626
18	Michael Garcia		92701
19	Alicia Merenas		92345
20	Susan Dembowski		91107
21	Charles Brown		90036
22	Vern Tuck Taylor		90066
23	Kristy Pace		91423
24	Mara Katsoulian		91107
25	Marian Gordon		90029

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Pétition to protect the Los Cerritos Wetlands from expanded oil drilling

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	Print full name	Signature	Zip code
1	JOHN BERGER	<i>John Berger</i>	90712
2	LINDA HICKS	<i>Linda Hicks</i>	92649
3	Rebecca Newcombe	<i>Rebecca Newcombe</i>	90804
4	Eric James Turt	<i>Eric Turt</i>	90804
5	Fernando Soriano	<i>Fernando Soriano</i>	90804
6	Gabrielle Fata	<i>Gabrielle Fata</i>	90802
7	Joe Fata	<i>Joe Fata</i>	90802
8	Najwa Fata	<i>Najwa Fata</i>	90802
9	Anthony Fata	<i>Anthony Fata</i>	90802
10	Nick Lopez	<i>Nick Lopez</i>	90803
11	DAVID ROMERO	<i>David Romero</i>	90803
12	Colleen Owen	<i>Colleen Owen</i>	90740
13	Harvann Murray	<i>Harvann Murray</i>	90740
14	VITO RACANO	<i>Vito Racano</i>	90803
15	Gina Su	<i>Gina Su</i>	90803
16	Trey Wilton	<i>Trey Wilton</i>	90815
17	Susan Bernstein	<i>Susan Bernstein</i>	90815
18	Teresa Demaree	<i>Teresa Demaree</i>	90813
19	DESMOND COLEMAN	<i>Desmond Coleman</i>	90803
20	Linda Cojohn	<i>Linda Cojohn</i>	90803
21	Andrew Edman	<i>Andrew Edman</i>	90803
22	Will Gresham	<i>Will Gresham</i>	90803
23	Jason Weber	<i>Jason Weber</i>	90630
24	LOREN FIERMAN	<i>Loren Fierman</i>	90807
25	Mary C. Lopez	<i>Mary C. Lopez</i>	90802

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

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	Print full name	Signature	Zip code
1	Claudia Burkett	C. Burkett	90814
2	Vicky Wilwan Harrison	Vicky Wilwan Harrison	90814
3	Rachel Borje	Rachel Borje	90807
4	Roman Borje	Roman Borje	90713
5	VICTA BORJE	VICTA BORJE	90807
6	Susanne Walker	Susanne Walker	90803
7	Briana Baker	Briana Baker	90815
8	Kathy Garcia	Kathy Garcia	90815
9	Leon Follus	Leon Follus	90740
10	John Shinn	John Shinn	90815
11	Don Walker	Don Walker	90803
12	ALEX GUNDERSEN	Alex Gundersen	90802
13	Sara Padilla	Sara Padilla	90755
14	Arleen Ramirez	Arleen Ramirez	90803
15	Kim James	Kim James	91710
16	Jenny Torres	Jenny Torres	92807
17	Caterin Benamun	Caterin Benamun	95104
18	Eiman Abdelmonem	Eiman Abdelmonem	90803
19	STEVEN ANDRONE	Steven Androne	90740
20	Bryan Audiss	Bryan Audiss	90803
21	Halcy Collins	Halcy Collins	90803
22	Karey Sharp	Karey Sharp	90815
23	David Sharp	David Sharp	90815
24	SHERILL SPENCER	Sherill Spencer	90715
25	Kylie Davis	Kylie Davis	90803

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

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	Print full name	Signature	Zip code
1	RONALD RYAN		90803
2	Damien Luzzo		90278
3	Luis R. URRUTIA		90813
4	John Haas		90278
5	ALEXIS EUBREY		90802
6	Maria Demers		90015
7	Elliot Gonzales		90813
8	LESLIE BRYANT		90803
9	YVETTE MOSEMAN		90814
10	Eiza Petersen		92648
11	Andray McWay		90815
12	Tina Morrissi		90803
13	Kathryn Morriss		90803
14	LARRY L. BARON		90803
15	Claire Bischoff		92841
16	Richard Wolff		90504
17	Rebecca Ross		90504
18	Colette Anderson		90630
19	Evan DeGree		90805
20	Sanjana DeGree		90805
21	Jessica Ocampo		90813
22	Clara Vigil		90815
23	Rachel Schaller		90815
24	Sheryl Marsh		90712
25	Jonataaan Rich		90802
	Jodi Rich		90802

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Sean Rich Sean Rich 90802

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

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	Print full name	Signature	Zip code
1	Craig Gibson		90740
2	Connie Delgado		92683
3	Henny Gonzalez		92683
4	Robert Gurrea		90041
5	MARK REED		92262
6	JULIAN MONTELONGO		90505
7	ANDREW DIAZ		90717
8	Jeanne Curtis		90621
9	Evelyn Gomez		94520
10	JOSE MUÑOZ		90631
11	Nino		9306
12	Elaine Meyers		90802
13	Kurt Sanchez		90804
14	Louis Frayser		90813
15	Brian Bello		90262
16	Cole Chadwick		02474
17	Luis Cortez		90806
18	Felipe Maria Vera		90802
19	Rigoberto Gutierrez		91342
20	Cindy Ochoa		91942
21	James Tannessa		91977
22	Eric Bracic		90710
23	Rose Mathney		90023
24	Kate Sneed		90032
25	Kelly Logan		90802

AUS

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

We, the undersigned, oppose the Los Cerritos Wetlands Restoration and Oil Consolidation Project. We demand that the Los Cerritos Wetlands Authority withdraw from a land exchange with Beach Oil Mineral Partners which would allow for oil drilling beneath the Los Cerritos Wetlands, the disruption and destruction of wildlife habitat and Native American sites

	Print full name	Signature	Zip code
1	William King Reilly	William King Reilly	90027
2	Teresa Krueger	Teresa Krueger	91342
3	Felicia Bander	Felicia Bander	90066
4	TESS O'CONNOR	TESS O'CONNOR	90028
5	Anita Rivera	Anita Rivera	90240
6	Rachael Lehmborg	Rachael Lehmborg	90740
7	TANY CANFORA	TANY CANFORA@ME.COM	90740
8	Irene Costaro	Irene Costaro	90740
9	Jacquie Clarke	Jacquie Clarke	90740
10	Suzan Scheid	Suzan Scheid	90740
11	Suzannah Bray	Suzannah Bray	90740
12	Nina Zasotin	Nina Zasotin	90740
13	BETTE SMIRNOFF	Bette B. Smirnoff	90740
14	Ellen Brannigan	Ellen Brannigan	90740
15	ORDIE L KRAV	Ordie L. Krav	90740
16	Bev Bender	Bev Bender	90740
17	EDMUND J. WIANECKI	Edmund J. Wianeck	90740
18	GARY KRANIL	Gary Kranil	90740
19	Fred Fenton	Fred Fenton	90740
20	STEVEN COHEN	Steven Cohen	90740
21	Mary Troncy	Mary Troncy	90740
22	SUSIE RALSTON	Susan M. Ralston	90740
23	Peter Rosenwald	Peter Rosenwald	90740
24	Lisette	Lisette	90815
25	Diego Araya	Diego Araya	92647

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	Print full name	Signature	Zip code
1	Daniel Contreras		90630
2	Shannon MacDonald		92591
3	Destiny Verdugo		92373
4	Brian Ramirez-Morales		92373
5	Guillermo Andrade		90705
6	Stephen Provenzio		90603
7	Xochitl Villa		90041
8	Chase Anderson		93306
9	Sara McComas		93306
10	MATIAS LOMBARDO		90804
11	LUIS CORBET		90806
12	KRISTINA CAVILL		90814
13	Allison Lloyd		90803
14	Ashley Lloyd		90803
15	Milan Lloyd		90803
16	Elly Lloyd		90803
17	Liliana Gonzalez		90814
18	Sandi Martin		90813
19	Shana Light		90813
20	Danielle Carrillo		90650
21	Juan C. Garcia		92841
22	Ryan Hernandez		92649
23	Charlotte Anning		90814
24	Ted Anning		90814
25	Amber Patrick		90703

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

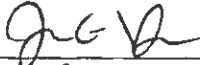
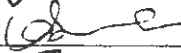
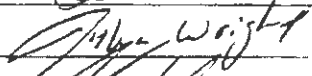
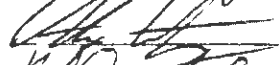
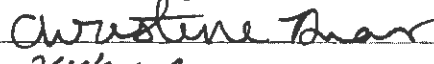
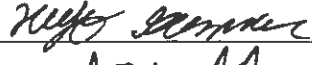
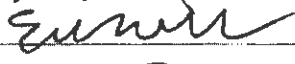
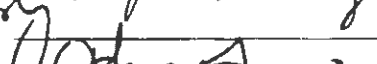
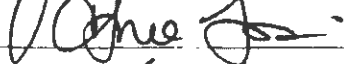
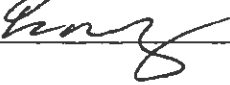
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	Print full name	Signature	Zip code
1	Karen Chavez	K Chavez	92630
2	Michael Hobbard	M Hobbard	91744
3	Gabriel Covarrubias	G Covarrubias	92346
4	EDUARDO COVARRUBIAS	E Covarrubias	92346
5	George Guncin	G Guncin	91744
6	DAVID SAGAS	D Sagas	90748
7	Stacy Arnsperger	S Arnsperger	90778
8	Scott Fonseca	S Fonseca	91765
9	Tammy Arnsperger	T Arnsperger	90025
10	BRYAN GRIFFITH	B Griffith	90781
11	Mija Telsourey	M Telsourey	90802
12	Blake Scott	B Scott	90802
13	ANDREW MCK	A McK	92285
14	Kevin Hamabata	K Hamabata	93950
15	Alexandra Adame	A Adame	90044
16	Michael Arceo	M Arceo	92707
17	Ariadna Flores	A Flores	90804
18	Sofia Zambrano	S Zambrano	90802
19	Melissa Crumby	M Crumby	90005
20	Carol Bryant	C Bryant	90802
21	Jordan Wilbert	J Wilbert	90813
22	Jasmine Dydale	J Dydale	92116
23	Devan Fara	D Fara	90813
24	Robin Parrish	R Parrish	90026
25	Christian Mavero	C Mavero	91607

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	Print full name	Signature	Zip code
1	Julio Vargas		90034
2	Vibhanshu		90034
3	Toshua Wright		90701
4	Alex Cortez		90814
5	Kaitlyn Deschene		90802
6	Marc Krell		91177
7	Mackenzie Snyder		92058
8	Will Snyder		92058
9	Sara Vaughn		92026
10	Yasmin Al-Har		90805
11	Alicia Castanovo		90805
12	Christine Dias		91411
13	Hugo Guzman		91411
14	Anne Mathaiwala		90292
15	Amber Adcock		92683
16	Coty Casciano		92683
17	Felipe Dorantes		90813
18	ERIK SELLER		93003
19	Arny Barsekian		90640
20	HIMAL GURUNG		91401
21	Malyneth Vany		90806
22	Katerine Benitez		92648
23	Christine Fries		90815
24	Johnny Mijang		90242
25	Erica Gomez		90240

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Petition to protect the Los Cerritos Wetlands from expanded oil drilling

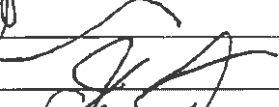
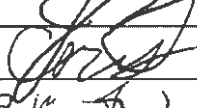
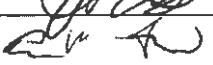
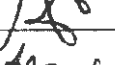
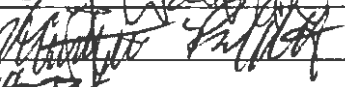
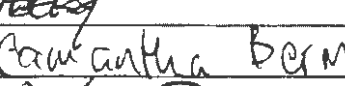
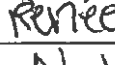
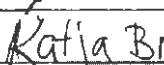
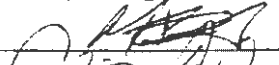
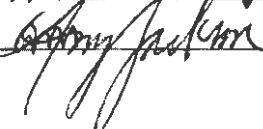
We, the undersigned, oppose the Los Cerritos Wetlands Restoration and Oil Consolidation Project. We demand that the Los Cerritos Wetlands Authority withdraw from a land exchange with Beach Oil Mineral Partners which would allow for oil drilling beneath the Los Cerritos Wetlands, the disruption and destruction of wildlife habitat and Native American sites

	Print full name	Signature	Zip code
1	Alyssa Bishop		90803
2	Emily Hutton		90802
3	Sam Gago		90802
4	Mitch Rogers		90802
5	Jessica Giles		90802
6	Austin Cryote		90815
7	Joshua J. Edwards		90805
8	Tyler Spracher		92646
9	MIRANDA GAMEZ		90802
10	Hannah Afre		90804
11	Griffin Rogers		90755
12	Chris Rusznorsky		90755
13	Dakota Humphreys		90802
14	Marion Hylton		90814
15	Lawrence Pacino		90803
16	Isabella Grallishaw		90803
17	Andrew Lane		90802
18	Jordan Hermosillo		90802
19	Landon Hajdu		90802
20	CHARLIE BEAUDOIN		90803
21	Chloe Johnson		90802
22	Janine Rossi		90802
23	ALYSSA BISHOP, JSM		90712
24	JARAH WARBLE		90802
25	Guzman Yasmine Dadashi		90802

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	Print full name	Signature	Zip code
1	Ashley Barber		90803
2	Jeff Stratford		90814
3	Chris Nagle		90807
4	Erin Foley		90813
5	Rylee Mose		90813
6	Brian J. Adams		90802
7	Angela Almaguer		90814
8	Alan Curre		90803
9	Emily Wasilewski		90813
10	Matthew Proffitt		90803
11	Rene Darrell		90813
12		Ramantha Bernam	90630
13		Renee Bruno	90712
14		Nate Hubbell	90802
15	Katja Brecejinik	K. Brece	90804
16	Alina Brumby		90813
17	Corina Alvarez		90802
18	Maria E. Vera	Maria E. Vera	90802
19	Alexandra J. Vera	Alexandra Vera	90802
20	Felipe Mora Vera	Felipe Mora - Vera	90802
21	Pamela Hennissen		91029
22	Deb Townes	debi2beach@yahoo.com	92677
23	Justin Chan	justinC1368chan@gmail.com	91739
24	Scott Stewart	TKillcreek@gmail.com	92629
25	Amy Jackson		92651

Return petitions to: Protect the Long Beach/Los Cerritos Wetlands, 259 Termino Ave, Long Beach 90803

Bruce Bullock
624 Club Drive
Allen, TX 75013
bullocb@mac.com

California Coastal Commission
South Coast District
200 Oceangate 10th Floor
Long Beach CA 90802

Dear Sir Madam:

I am writing in regard to the Los Cerritos Wetlands Oil Consolidation and Restoration Project. I currently run an oil and gas think tank and teach oil and gas operations and business courses at Southern Methodist University in Dallas Texas, although any opinions expressed in this letter are solely my own.

A student from the Long Beach area in one of my classes made me aware of the somewhat unique and progressive efforts in regards to this project to consolidate the footprint of oil operations, restore wetlands, and provide much need lower carbon crude oil to California refineries.

After studying the project, including visiting the site and attending the Long Beach City Council meeting, I plan to write and publish a case study on this effort for students preparing for careers in the oil and gas and energy industries at universities globally. The project provides perhaps the best example of the following that I have seen in a number of years as a 25-year oil industry veteran and a 10-year academic:

- A win-win for the community, the environment and the oil industry
- An example where producing oil locally will provide lower carbon oil that will displace imported oil with a higher carbon footprint
- A project that restores over 150 acres of wetlands and/or vital habitat. There are many such opportunities throughout the country but few that have come to fruition. Showcasing one that actually happens will be significant.
- A project that demonstrates extraordinary interaction between the companies involved and the community. Few companies engage the community the way Synergy and the Beach Oil Minerals Partners team have.

As a veteran of the oil industry, I am certainly aware of the instances in which the industry has fallen short of its corporate social responsibilities and lacked the appropriate operational safeguards. From my perspective, I certainly hope the project is approved and we will be able to showcase a project where the operators have shown to be more than up to the task.

Sincerely,



W. Bruce Bullock

Huckelbridge, Kate@Coastal

From: Terrybette <terrybette@aol.com>
Sent: Friday, August 03, 2018 3:17 PM
To: Huckelbridge, Kate@Coastal
Subject: Fwd: Los Cerritos Wetlands

Dr. Huckelbridge and Honorable Commissioners,

As a resident of Long Beach I want you to know that I fully support the amendment Beach Oil Minerals/Los Cerritos Wetlands Oil Consolidation and Restoration Project. Having the wetlands restored will be great for present and future citizens of Long Beach and California. I have been looking forward to this improvement for a long time. I hope you will support this amendment.

Bette McKinney
3719 E Fifth St
Long Beach, CA 90814

Huckelbridge, Kate@Coastal

From: S Brothers <sjbrothers@gmail.com>
Sent: Friday, August 03, 2018 3:12 PM
To: anngadfly@aol.com
Cc: Turnbull-Sanders, Effie@Coastal; Brownsey, Donne@Coastal; Aminzadeh, Sara@Coastal; Vargas, Mark@Coastal; Sundberg, Ryan@Coastal; Peskin, Aaron@Coastal; Groom, Carole@Coastal; Howell, Erik@Coastal; Uranga, Roberto@Coastal; Padilla, Stephen@Coastal; Faustinos, Belinda@Coastal; Pendleton, Brian@Coastal; Urias, Bryan@Coastal; Garcia-Erceg, Nidia@Coastal; Escalante, Linda@Coastal; Ward, Christopher@Coastal; Huckelbridge, Kate@Coastal; Hoorae1@aol.com; jweins123@hotmail.com; mbcotton@hotmail.com; renee_matt@live.com; corlisslee@aol.com; mpshogrl@msn.com; tami_bennett@hotmail.com; Christensen George; rebrobes1@gmail.com; p.martz@cox.net; cmoore@algalita.org; taheshakc259@gmail.com; chiefrbwife@aol.com; elcross@sbcglobal.net; a.mooneydarcy@gmail.com
Subject: Re: Long Beach LCP Amendment No. 1-18

Thank you so much for doing this, Ann. Very lucid response. Thank you for your diligence and work - I know it takes hours just to read the initial CCC response and recommendations and usually equal time to draft a response as meticulously and eloquently as you have done. I'm out on the road now, but will be back for the 8th.

Steve Brothers

On Fri, Aug 3, 2018 at 12:35 AM, <anngadfly@aol.com> wrote:
Dear Commissioners and Staff:

Attached please find comments on Agenda Item 15 from Ann Cantrell on behalf of Citizens About Responsible Planning (CARP) and Protect the Los Cerritos Wetlands. I apologize for the length, but realize speaking time may be short at the August 8 hearing.

Sincerely,
Ann Cantrell, CARP Treasurer, Board Member Protect the Los Cerritos Wetlands
Joe Weinstein, CARP President
Corliss Lee, CARP Secretary
Rae Gabelich, CARP Director
Melinda Cotton, CARP Director
Susan Miller, CARP Director
Renee Lawler, CARP Director
Tami Bennett, CARP Director
Anna Christensen, Chair Protect the Los Cerritos Wetlands
Tahesha K. Christensen, Protect the Los Cerritos Wetlands
Rebeca Robles, Protect the Los Cerritos Wetlands,
Patricia Martz, Protect the Los Cerritos Wetlands,
Charles Moore, Protect the Los Cerritos Wetlands,
Steve Brothers, Protect the Los Cerritos Wetlands
Anthony Morales, Protect the Los Cerritos Wetlands
Angela Mooney D'Arcy, Protect the Los Cerritos Wetlands
Alfred Cruz, Protect the Los Cerritos Wetlands

Huckelbridge, Kate@Coastal

From: Coastal Los Cerritos Wetlands
Sent: Friday, August 03, 2018 2:45 PM
To: Huckelbridge, Kate@Coastal
Cc: Hudson, Steve@Coastal
Subject: FW: Long Beach wetlands project

Sonia Beckford

From: Gary Stickel [<mailto:dregarystickel@att.net>]
Sent: Friday, August 03, 2018 2:26 PM
To: Coastal Los Cerritos Wetlands
Subject: Long Beach wetlands project

Dr. Kate Huckelbridge
State of California Government

August 3, 2018

Dear Dr. Huckelbridge,

I am writing to you regarding The Los Cerritos Wetlands Oil Consolodation and Restoration Project. I have reviewed the project and have spoken with project staff from the City of Long Beach. I did so because I have 50 years experience in dealing with local archaeology and Native Americans. I gained that experience by obtaining my B.A., M.A. and Ph.D. at UCLA where i also taught. I have also directed my own firm Environmental Research Archaeologists: a Scientific Consortium (ERA) since 1974. My research has been verified by our national museum, the Smithsonian (which was reported by The London Times; its on their website). Since I retired from teaching at UCLA, I have continued to be professionally active. Relevant to this project, at the request of the true Indian Tribe of the area the Kizh (aka "Gabrieleno"), I helped them to nominate the entire "Sea of Kizh" to the State of California's Native American Heritage Commission (NAHC) and they approved it with their formal designations. The Long Beach coast is part of the Sea of Kizh and the wetlands in question were connected to it. The subject project should be approved as it would remove the unsightly oil wells, and more importantly conduct toxic cleanups and restore the wetlands environments. The project will be sensitive to the KIizh Native Americans and their archaeology and any human remains that may be found. The so-called "tongva" opponents of the project (with thkeir own ontoward agenda) are impostors. They are not true local Indians and have been proven so by Lady Lorrailne Escobar who is not only a prominent California Native American (Chair of her Esselen Tribe of the Monterey area) but she is also a State certified genealogist. her evidence can be provided to you as well as my 50 page research paper on why the true tribe of the area is called "Kizh not Tongva" (I will be happy to provide you with a copy if you wish.

In short, I could not recommend this worthy and beneficial project to you more highly,

truly yours,
E. Gary Stickel, Ph.D.
ERA Archaeologist

Tagab, Clarita@Coastal

From: Karen Reside <longbeachgraypanthers@gmail.com>
Sent: Friday, August 03, 2018 1:55 PM
To: Energy@Coastal; Myron Wollin; Edric Guise
Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

August 1, 2018

California Coastal Commission

Dear Coastal Commission Members:

The Long Beach Gray Panthers supports the proposal of Beach Oil Minerals Partners (BOMP) to consolidate 100 acres of oil operations to a footprint of just 10 acres. This project will acquire 154 acres of coastal wetlands in exchange for a 5-acre industrial parcel which BOMP will use as an oil operation consolidation site. If this happens, 77 acres of coastal habitat, including Steamshovel Slough, will be enhanced and restored immediately, while the other 77 acres will be set aside into perpetuity for future restoration once the oil operations have been fully removed. Furthermore, the Los Cerritos Wetlands Authority will receive the old Bixby Ranch Building to use as a visitor's center and a public trail will be created starting from that building and terminating at an overlook above Steamshovel Slough. The entire project will be paid for by BOMP. This project will benefit the community by creating access to the Wetlands and an educational center to teach people about the purpose of and create direct observation opportunities within the Wetlands. This project will begin the process of rebuilding the local wetland system and support more effective and efficient natural water control and recovery systems as a piece of a larger water system.

This is a complicated project and has taken 4 years to develop, to ensure the reduction of opportunities for spills and to protect marine and wild life within the environment. This project is crucial for the Los Cerritos Wetlands Land Trust for the achievement of its mission to acquire, protect, conserve, restore, maintain, and enhance Los Cerritos Wetlands for the public benefit and to conserve populations of numerous special status species.

This project is controversial within the community as it involves the extraction of oil and community members who are not fully educated on the process, are opposed solely for that reason and have not fully examining the benefits to be gained by this development project. After much discussion and many presentations, The Long Beach Gray Panthers came together to support this project with the recommended amendments. We can be reached at (562) 353-7015 or via e-mail at longbeachgraypanthers@gmail.com for any further questions.

Sincerely,

Karen Reside, Secretary
Long Beach Gray Panthers

Tagab, Clarita@Coastal

From: Alyssa Bishop <alyssabishopyoga@gmail.com>
Sent: Friday, August 03, 2018 12:01 PM
To: Huckelbridge, Kate@Coastal
Subject: Beach Oil Mineral Partners

Hello Mrs. Huckelbridge,

I am emailing you in hopes to create some perspective for the upcoming Coastal Commission meeting. The "Restoration Project" is such a fowl play by the Beach Oil Mineral Partners that will continue to damage to our wetlands while blinding the masses to think its okay because it is under "restoration". We need to all unite in stopping the oil companies' power over all of us, and the planet. The only way to boot them out of controlling our city is to start pushing back, and I urge you to see this upcoming Coastal Commission meeting as the time for resistance.

I was unable to comment on Agenda item # 15 online it said 404 page not found. How can my voice be heard if the page where I should be able to is down?

<https://www.coastal.ca.gov/meeting/agenda/#2018/8>

With urgency and hopefulness,

Alyssa Bishop

Tagab, Clarita@Coastal

From: Dorothy Golz <dorothy.golz@me.com>
Sent: Friday, August 03, 2018 11:43 AM
To: Energy@Coastal
Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach
LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

We support your staff's recommendation to amend the Local Coastal Plan with the suggested modifications and ask that the commission approve it.

Dorothy Golz
Helmut Golz
7147 E. Killdee St.
Long Beach, CA 90808

Sent from my iPad

Huckelbridge, Kate@Coastal

From: Courtney Christenson <courtchrist@hotmail.com>
Sent: Friday, August 03, 2018 11:00 AM
To: Coastal Los Cerritos Wetlands; Energy@Coastal
Subject: Support for Los Cerritos Wetlands restoration

To whom it concerns at the CA Coastal Commission:

I am writing today in support for the Los Cerritos Wetlands Oil Consolidation and Restoration Project.

I have been a longtime support of the Los Cerritos Wetlands Land Trust and trust that their vetting of this project has been diligent and thoughtful, with the goal of protecting and restoring the precious little that remains of our local coastal wetlands. With our wetlands and natural open spaces long exploited and overdeveloped, this project is a good one — an opportunity to reclaim and restore a jewel of the Los Cerritos Wetlands complex.

I ask that you please allow this important project to move forward.

Thank you,

Courtney Christenson
(El Dorado East) Long Beach resident, Killdee St

August 2, 2018

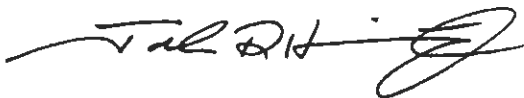
Kate Huckelbridge
California Coastal Commission
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

Re: City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

Dear California Coastal Commission,

I am writing to you to express my full support of the Gabrieleno Band of Mission Indians – Kizh Nation in their objectives to protect, preserve, and restore the saltwater wetlands which was part of their sacred Kizh village of Puvungna. The land today is part of the City of Long Beach and is known as Los Cerritos Wetlands. This sacred area for the Kizh needs to be protected and preserved, however, what is essential for its future preservation is its restoration. This includes the removal of all oil production wells from these saltwater wetlands to eliminate any future chance of leakage or damage to the soil, or contamination of the air, or poisoning of the plants and wildlife still living in these wetlands. I support the Kizh Nation's joint efforts with the Los Cerritos Wetlands Trust and the Beach Oil Mineral Partners to clean up and restore these wetlands to help regain its previous ecological functions. If left alone, in its current state, the land will simply continue to degrade leading to the permanent elimination of the last remaining plants and animals living in these wetlands. Restoration is a necessary reality for this wetland and it takes work – something the Kizh Nation is capable and wanting to do. Protection and Preservation of sacred areas does not include neglect and leaving them as is, which will ultimately lead to its loss. I thank you for taking the time to take my opinion into account.

Sincerely,

A handwritten signature in black ink, appearing to read "John R. Harrington", with a stylized flourish at the end.

John R. Harrington
Mayor, City of San Gabriel

August 2, 2018

TO: Commissioners and Interested Persons

From: Renee Lawler, 3005 San Francisco Ave, Long Beach CA 90806

SUBJECT: City of Long Beach Local Coastal Program (LCP) Amendment Request No. 1-18 (LCP-5-LOB-18-0026). For public hearing and Commission action at the Commission's August 8, 2018 meeting in Redondo Beach.

The Commission is being asked to vote on four Motions and Resolutions. I urge you to not certify the modifications that would allow oil and gas development on two sites within the SEADIP area.

According to Mallon v City of LB – 4/13/56 Tidelands statutes Chapter 29 Section 10 (b)...no present or future contract....for oil....shall be modified or amended in any respect without the advance consent of the State Lands Commission....(c) Every future contract, future royalty arrangement, or other future agreement, & every modification or amendment of any present or future contract...made in violation of this section shall be void.

Please reference the SUMMARY OF LCP AMENDMENT REQUEST NO. 1-18 submitted by Alison Dettmer, Deputy Director, Kate Huckelbridge, Senior Environmental Scientist dated 7/26/18 (see below the portion of that report) Section 12 & 13 of which I am referring - the action(s) **may not be legally permissible**, according to prior Tidelands case law.

*13. Oil and gas development shall be permitted in accordance with Section 12, if the following conditions are met: a. The development is performed safely and consistent with the geologic conditions of the well site. b. New or expanded facilities related to that development are consolidated, to the maximum extent feasible **and legally permissible**, unless consolidation will have adverse environmental consequences and will not significantly reduce the number of producing wells, support facilities, or sites required to produce the reservoir economically and with minimal environmental impacts.*

Please vote no on LCP amendment request to the certified Land Use Plan (LUP) and Implementation Plan (IP) policies in the Southeast Area Development and Improvement Plan (SEADIP) and the City's Oil Code, both components of the City of Long's Beach's LCP. Amendment Request No. 118 would add Oil Production Uses as an allowable use on two sites located within the SEADIP area, the Pumpkin Patch site (part of Subarea 25) and the Los Cerritos Wetlands Authority (LCWA) site (Subarea 19). The LCP amendment would also revise the City's Oil Code to reflect the addition of these two areas as "Oil Operating Areas." The City Council submitted the LCP amendment request for Commission certification with City Council Resolution No. RES-18-0010. The proposed changes to the LCP are set forth in City Ordinances No. ORD-18-0001 and No. ORD-18-002.

At present, until the proposed amendments are fully reviewed by the State Lands Commission, they may not be legally permissible, subject to being void, without the prior approval from the State Lands Commission.

I am opposed to these amendments and/or drilling new wells, as there is likelihood of negative impacts due to the geologic condition, sensitive ESHA, historic coastal wetlands areas which should be protected by and subject to public trust doctrine.



Technical Consultation, Data Analysis and
Litigation Support for the Environment

2656 29th Street, Suite 201
Santa Monica, CA 90405

Matt Hagemann, P.G., C.Hg.
(949) 887-9013
mhagemann@swape.com

August 2, 2018

Kate Huckelbridge, PhD
California Coastal Commission
Energy, Ocean Resources & Federal Consistency Division
45 Fremont St. Ste. 2000
San Francisco, CA 94105

Via Email Kate.Huckelbridge@coastal.ca.gov
loscerritoswetlands@coastal.ca.gov

Re: Beach Oil Minerals/
 Los Cerritos Wetlands Oil Consolidation and Restoration Project
 City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1)

Dear Dr. Huckelbridge and Honorable Commissioners:

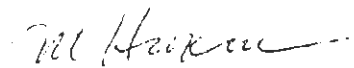
SWAPE was retained by Los Cerritos Wetlands Land Trust (LCWLT) to review the Los Cerritos Wetlands Oil Consolidation and Restoration Project (Project) proposed by Beach Oil Minerals (BOM). The Project would consolidate 187 acres of active oil operations onto 10 acres and provide for restoration of wetlands once oil infrastructure is removed. The planned restoration requires breaching a berm to restore tidal flow. LCWLT was concerned that the Project's restoration activities had the potential to contaminate the wetlands, given the past history of oil production and industrial activities at the site. After consultation with BOM and after thorough investigation of the site and of BOM's remediation plans, we are confident contamination will not occur.

SWAPE visited the Project site, met with BOM's representatives, and carefully reviewed BOM's analyses of the Project site. We concur with BOM regarding the locations most likely to require remediation and with BOM's proposed remediation procedures. BOM has committed to a thorough and transparent process regarding the assessment and removal of onsite hazards and contamination. This process ensures there will be no contamination of Los Cerritos Wetlands as the Project site transitions from oil operations to conservation.

SWAPE will remain involved in Project oversight on behalf of LCWLT. BOM has agreed allow SWAPE site access during key activities, including excavation, additional sampling, and berm removal. SWAPE will also assist with scoping an ecological risk assessment that will be completed prior to beginning restoration work. Finally, SWAPE will receive and review BOM's reports about site conditions, additional testing, and clean-up protocols.

Please contact us if we can assist the Commission in its consideration of this Project.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Hagemann".

Matt Hagemann, P.G., C.Hg.

cc: Michael DiSano, Project Manager, Beach Oil Minerals

August 2, 2018

To: California Coastal Commission

Via Email: loscerritoswetlands@coastal.ca.gov

Re: Beach Oil Minerals/ Los Cerritos Wetlands Oil Consolidation and Restoration Project
Requesting Approval of City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1)

Dear Coastal Commission Staff and Honorable Commissioners:

I am writing you to show my support for the Los Cerritos Wetlands Oil Consolidation and Restoration Project proposed by Beach Oil Minerals (BOM). I have attended local presentations and reviewed a considerable amount of published information regarding the proposed Project, and thus believe I am qualified to take a more than passing interest in the Project. I support this Project because it includes comprehensive wetlands and habitat restoration, provides unique public access opportunities, consolidates oil operations offsite, and will potentially result in the transfer of ownership of a substantial portion of Los Cerritos Wetlands into the public domain.

I understand there are a host of organizations and citizen allied against this Project. However, as I understand it, their opposition is primarily based on the simplistic view of "leaving the oil in the ground". I believe that if the Project is not approved, oil production will continue as it is currently practiced well into the future, and the wetlands will not be restored or made assessable to the public any time in the near (or potentially distant) future. The Project should be viewed in light of restoring the Wetlands and opening them to the public, both of which I believe are priorities of the Coastal Commission.

Sincerely;

Karl Eggers
Resident of Long Beach CA

Tagab, Clarita@Coastal

From: Tina Pirazzi <tpirazzi@yahoo.com>
Sent: Thursday, August 02, 2018 11:56 PM
To: Coastal Los Cerritos Wetlands
Subject: Los Cerritos Wetlands Oil Consolidation and Restoration Project

Attn: Kate Huckelbridge

CA Coastal Commission

Dear Ms. Huckelbridge ~

Not only is the Los Cerritos Wetlands Oil Consolidation and Restoration Project extremely exciting, but as the result of years of negotiation, compromise and innovation, it presents a beacon of hope for conservation efforts working in tandem with big business (in this case, oil) and should be recognized as such.

I support this Project, can't wait to see the wetlands restored(!), and urge you to approve this updated version of the Local Coastal Plan (LCP).

Thank you for your consideration of the revised LCP, it is a win-win for all parties and should be approved!

Kindest regards,
~ Tina Pirazzi

Tagab, Clarita@Coastal

From: anngadfly@aol.com
Sent: Thursday, August 02, 2018 11:36 PM
To: Turnbull-Sanders, Effie@Coastal; Brownsey, Donne@Coastal; Aminzadeh, Sara@Coastal; Vargas, Mark@Coastal; Sundberg, Ryan@Coastal; Peskin, Aaron@Coastal; Groom, Carole@Coastal; Howell, Erik@Coastal; Uranga, Roberto@Coastal; Padilla, Stephen@Coastal; Faustinos, Belinda@Coastal; Pendleton, Brian@Coastal; Urias, Bryan@Coastal; Garcia-Erceg, Nidia@Coastal; Escalante, Linda@Coastal; Ward, Christopher@Coastal; Huckelbridge, Kate@Coastal
Cc: Hoorae1@aol.com; jweins123@hotmail.com; mbcotton@hotmail.com; renee_matt@live.com; corlisslee@aol.com; mpshogrl@msn.com; tami_bennett@hotmail.com; achris259@yahoo.com; rebrobles1@gmail.com; p.martz@cox.net; cmoore@algalita.org; sjbrothers@gmail.com; taheshakc259@gmail.com; chiefrbwife@aol.com; elcross@sbcglobal.net; a.mooneydarcy@gmail.com
Subject: Long Beach LCP Amendment No. 1-18
Attachments: CCC letter 8818.docx

Dear Commissioners and Staff:

Attached please find comments on Agenda Item 15 from Ann Cantrell on behalf of Citizens About Responsible Planning (CARP) and Protect the Los Cerritos Wetlands. I apologize for the length, but realize speaking time may be short at the August 8 hearing.

Sincerely,

Ann Cantrell, CARP Treasurer, Board Member Protect the Los Cerritos Wetlands
Joe Weinstein, CARP President
Corliss Lee, CARP Secretary
Rae Gabelich, CARP Director
Melinda Cotton, CARP Director
Susan Miller, CARP Director
Renee Lawler, CARP Director
Tami Bennett, CARP Director
Anna Christensen, Chair Protect the Los Cerritos Wetlands
Tahesha K. Christensen, Protect the Los Cerritos Wetlands
Rebeca Robles, Protect the Los Cerritos Wetlands,
Patricia Martz, Protect the Los Cerritos Wetlands,
Charles Moore, Protect the Los Cerritos Wetlands,
Steve Brothers, Protect the Los Cerritos Wetlands
Anthony Morales, Protect the Los Cerritos Wetlands
Angela Mooney D'Arcy, Protect the Los Cerritos Wetlands
Alfred Cruz, Protect the Los Cerritos Wetlands

California Coastal Commission

ITEM 15

To: Commissioners and Interested Persons

From: Ann Cantrell for Citizens About Responsible Planning (CARP) and Protect the Los Cerritos Wetlands

Agenda Item W15 City of Long Beach Local Coastal Program (LCP) Amendment Request No. 1-18 (LCP-5-LOB-18-0026) For Public hearing and Commission Action at the Commission's August 8, 2018 meeting in Redondo Beach

The Commission is being asked to vote on four Motions and Resolutions. We urge you to make the following votes:

Motion 1 NO Motion II NO Motion III YES Motion IV NO

Following is a summary of our reasons:

Motion 1 *I move that the Commission certify Land Use Plan Amendment no. 1-18 to the City of Long Beach Land Use Plan as submitted by the City of Long Beach.*

We agree with staff that the Commission should not certify the Land Use Plan Amendment No. 1-18 of the City's Land Use Plan as submitted by the City of Long Beach. As stated in Resolution I, Certification of the Land Use Plan amendment would not comply with the California Environmental Quality Act because there are feasible alternatives or mitigation measures which could lessen adverse impact which the Land Use Plan Amendment (LUPA) could have on the environment. Most importantly, the LUPA does not conform with the policies of Chapter 3 of the Coastal Act. Please vote NO.

Motion II *I move that the Commission certify the Land Use Plan Amendment No. 1-18 for the City of Long Beach if it is modified as suggested in this staff report.*

Resolution II

The Commission hereby certifies the Land Use Plan Amendment 1-18 for the City of LB if modified as suggested and adopts the findings set forth below on the grounds that the Land Use plan Amendment with suggested modifications will meet the requirements and be in conformity with the policies of Chapter 3 of the Coastal Act. Certification of Land Use Plan Amendment if modified as suggested complies with the Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the plan on the environment or 2) there are no further feasible alternatives or mitigation measures that would substantially lessen any significant adverse impacts which the Land Use Plan Amendment have on the environment.

We are urging a No vote on this motion as we believe the 15 modifications are unable to protect the environmentally sensitive habitat, the scenic and visual qualities, nor the cultural, archeological or paleontological resources from the adverse effects of oil drilling. (See below for comments on the Modifications)

Motion III *I move that the Commission reject the Amendment to the Implementation Program for the City of Long Beach certified LCP as submitted.*

We agree with staff that the Amendment to the Implementation Program as submitted does not conform with and is inadequate to carry out the provisions of the certified City Land Use Plan as amended. Certification of the Amendment would not meet the requirements of the CA Environmental Quality Act as there are feasible alternatives and mitigation measures that would substantially lessen the significant adverse impacts. We urge a Yes vote.

Motion IV *I move that the Commission certify the Amendment to the Implementation Program of the City of Long Beach certified LCP if it is modified as suggested in the staff report.*

Resolution IV

The Commission hereby certifies the Amendment to the Implementation Program for the City of Long Beach certified LCP if modified as suggested and adopts the findings set forth below on grounds that the Amendment to the Implementation Program with the suggested modifications will conform with, and is adequate to carry out, the provisions of the certified Land Use Plan as amended. Certification of the Amendment to the Implementation Program if modified as suggested complies with the CA Environmental Quality Act, because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the Implementation Program on the environment or 2) there are no further feasible alternative and mitigation measures that would substantially lessen any significant adverse impacts on the environment.

We urge the Commissioners to vote No. Although staff has worked very hard to attempt to modify and mitigate the potential harm which might be done by new oil drilling in an environmentally sensitive area, we find that most of these are inadequate. Please follow the Coastal Act Section 30121, which allows mineral extraction except in environmentally sensitive areas. There is argument as to whether the LCWA and the Pumpkin Patch are ESHA, but there is no argument that the Los Cerritos Wetlands, the San Gabriel River, Alamitos Bay and the Pacific Ocean could be damaged beyond repair by an oil spill from these new wells. Monitoring, sensors and shut-off valves will have little use in a large earthquake. Please do not put the best salt marsh in California at risk. Please vote No on Motion IV.

Detailed reasons below:

Motions II and IV both state that the modifications will comply with the CA Environmental Quality Act (CEQA) because there are no further feasible alternative and mitigation measures that would substantially lessen any significant adverse impacts on the environment. We would argue there are further feasible alternative and mitigation measures. In my comments for the DEIR, I wrote: The DEIR has an Alternative allowing a non-wetland restoration use on the LCWA site: Alternative 4: SCE Substation Alternative. However, there is no alternative allowing for the court ordered use.

Don May of Earth Corps, the former owner of the 5 acres at Studebaker and 2nd, states that when SC Edison conveyed this property to Earth Corps as settlement for the damage

done to marine life at San Onofre, the court ordered that the property was to be used to further the restoration of the estuary of the San Gabriel River.

On August 31, 2017, when asked if this was still the case, Don wrote: “Yes, it is still valid and binding, in as much as I am still signatory and have never been contacted as to any change”.

Don added: The tentative plan at the time was to use the 5 acres to construct a library to house Dr Rim Fay’s extensive Pacific Bio Marine library with extensive instructions on how to propagate every single plant and critter found on the entire So. Cal. Bight, along with his aquaria copied after Dr. Ed Ricketts’ and used in the film Cannery Row; to use it under a Cal State LB program to propagate endemic species for estuary restoration; and to partially fund construction and contain a community meeting room.”

A marine library/visitor center was never considered, rejected or studied as an Alternative use for the LCWA site.

Instead of an SCE Substation, a solar energy site could be another Alternative. If the City wants to provide a new source of energy, we suggest putting solar panels on these properties and leaving the oil in the ground.

As stated before, we believe all of the Modifications are inadequate, but several are particularly grievous:

Modification 5 on page 7 of the staff report states: *Environmentally sensitive habitat areas as defined in Coastal Act Section 30107.5 shall be protected against any significant disruption of habitat values and only uses dependent on those resources shall be allowed with those areas.* **I repeat that oil drilling will be disrupting habitat values. The Pumpkin Patch contains wetland obligate plant and animal species which will be permanently destroyed by both drilling and industrial uses.**

Modification 7. *All development that would adversely impact archaeological or paleontological resources shall include reasonable mitigation measures.* **What are these measures? Reasonable to whom? The local Native Americans do not find digging in, drilling on or degrading of their sacred lands reasonable.**

Modification 8. *The Scenic and visual qualities of coastal areas shall be considered and protected.* **Most people do not consider 160 foot drilling rigs and 18 foot block walls as scenic or visual qualities.**

Modification 9. *All development shall minimize risks to life and property in areas of high geologic, flood and fire hazard.* **Both of these proposed drilling areas**

are near the Newport/Inglewood earthquake fault, in a tsunami and flood zone. In recent years there have been fires in the Los Cerritos Wetlands. The best way to minimize risks to life and property in these areas is to not allow oil drilling or further building.

Modification 10. *All development shall assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. It will be impossible to drill hundreds of feet down next to an earthquake fault, extract oil and then force water back into the void and guarantee geologic stability.*

Modification 11. *All development shall minimize energy consumption and vehicle miles traveled. No matter how minimal, development of these two areas will add energy consumption and vehicle miles not present with current uses.*

Modification 12. *Where coastal-dependent industrial facilities or new or expanded oil development cannot feasibly be accommodated consistent with other policies of SEADIP, it may nonetheless be permitted if 1) alternative locations are infeasible or more environmentally damaging; 2) to do otherwise would adversely affect the public welfare; and 3) adverse environmental effects are mitigated to the maximum extent feasible. It appears that this Modification will allow new oil development anywhere in the SEADIP area as long as “the adverse environmental effects are mitigated”. This is unacceptable and must be rejected.*

Modification 13. *Oil and gas development shall be permitted in accordance with Section 12, if the following conditions are met:*

- a. *The development is performed safely and consistent with geologic conditions of the well site. How can oil drilling be done safely on an earthquake fault, in a tsunami zone with expected sea level rise?*
- b. *New or expanded facilities related to that development are consolidated to the maximum extent feasible and legally permissible, unless consolidation will have adverse environmental consequences and will not significantly reduce the number of producing wells, support facilities or sites required to produce the reservoir economically and with minimal environmental impacts. We consider consolidation to mean reduction of the number of oil wells. Adding two new areas of oil drilling is not consolidation, but expansion of oil development.*

Modification 14. *Where appropriate, developers shall be required to initiate monitoring programs to record land surface and near-shore ocean floor move-*

ments in locations of new large-scale fluid extraction on land before operations begin and shall continue until surface conditions have stabilized. This requirement appears to anticipate that removing oil can cause land movements. What use is monitoring if this does nothing to prevent an earthquake?

In conclusion, CARP and Protect the Los Cerritos Wetlands respectfully request you reject the City of Long Beach's Local Coastal Program Amendment and all of the suggested modifications. No new oil drilling should be allowed in SEADIP. The dangers to the environment and human health and safety are not worth the returns. Please, just say no to any new drilling, on or off of our coast.

Respectfully,

The Boards for Citizens About Responsible Planning and Protect the Los Cerritos Wetlands of Long Beach

Tagab, Clarita@Coastal

From: Cindy Crawford <cec1174@aol.com>
Sent: Thursday, August 02, 2018 9:14 PM
To: Energy@Coastal; Coastal Los Cerritos Wetlands
Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

Protect the Long Beach/Los Cerritos Wetlands (a very new, loose group of people protesting the Beach Oil Mineral Partners Wetlands Restoration/Oil Consolidation project) submitted a public comment on the subject item which states "*Our group Facebook page has @ 500 members...*" along with listing their many efforts and activities focused against the proposed wetlands projects.

I would like to respectfully point out non-profit 501(c)(3) groups and their members plus numerous individuals have fought to restore Los Cerritos Wetlands for decades, including attending many meetings with the city, the LCWA, public outreach, meetings, hiring independent legal and technical project reviews, and have actively participated in the public process for our wetlands restoration from the beginning. With the BOMP EIR and LCWA EIR now in process a restoration could finally be a reality.

If numbers (in terms of social media page members) matter, below lists groups and non-profits who support the restoration of Los Cerritos Wetlands and the number of members for each group's social media pages as of August 1, 2018:

686 members - Los Cerritos Wetlands Land Trust Facebook fan page

860 members - Save Los Cerritos Wetlands Facebook fan page

382 members - El Dorado Audubon Facebook Fan Page

787 members - El Dorado Audubon Twitter page

416 members - Tidal Influence Facebook fan page

474 members - Tidal Influence Instagram page

Total 3,506 social media page members for groups supporting Los Cerritos Wetlands (which may or may not be official members of the actual non-profit organizations themselves).

When taking public opinion into account, please consider the above.

Thank you for the opportunity to comment on this item.

Sincerely,

Cindy Crawford

Huckelbridge, Kate@Coastal

From: Nita Scott <nita.n.scott@gmail.com>
Sent: Thursday, August 02, 2018 8:40 PM
To: Huckelbridge, Kate@Coastal
Subject: Requesting Approval of City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

Re: Beach Oil Minerals/ Los Cerritos Wetlands Oil Consolidation and Restoration Project

Dear Dr. Huckelbridge and Honorable Commissioners

As a resident of the City of Long Beach I support this amendment and look forward to the improvements of the Los Cerritos Wetlands. This will be a great contribution to my city and the State of California to have this wetlands restored for my children and grandchildren.

I give total support to this, and I hope you will support it also. It is wonderful that we have the Bolsa Chica Wetlands and let us move forward to similar improvements in the Los Cerritos Wetlands.

Sincerely yours,

Nita Scott
245 Mira Mar Avenue
Long Beach, CA 90803

Tagab, Clarita@Coastal

From: Lynn Lorenz <lynnierlo@icloud.com>
Sent: Thursday, August 02, 2018 6:15 PM
To: Coastal Los Cerritos Wetlands
Subject: Public Comment on August 2018 Agenda Item. Wednesday 15A City of Long Beach LCP Amendment No 1-18(LCP-5-LOB-18-0026-1) (SEADIP)

I support Staff's recommendation to deny the amendment request as submitted, and support Staff's recommendations to certify the land use plan the requested modifications. This LCP Amendment will allow for wetlands restoration, something many people have desired for a very long time.

Thank you very much for your consideration.

Sincerely,
Lynn Lorenz
434 Redlands Avenue
Newport Beach, California 92663

Sent from my iPad

Tagab, Clarita@Coastal

From: Dave Weeshoff <weeshoff@sbcglobal.net>
Sent: Thursday, August 02, 2018 5:34 PM
To: Energy@Coastal; Coastal Los Cerritos Wetlands
Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

I support Staff's recommendation to deny the amendment request as submitted, and support Staff's recommendations to certify the land use plan with the requested modifications. This LCP Amendment will allow for wetlands restoration, something many people, including myself, have desired for a very long time.

Thank you very much for your consideration.

Sincerely,

Dave Weeshoff
Audubon Society
Cell phone 818-618-1652
5131 Briggs Ave. LaCrescenta, CA 91214

Tagab, Clarita@Coastal

From: Huckelbridge, Kate@Coastal
Sent: Thursday, August 02, 2018 2:52 PM
To: Tagab, Clarita@Coastal
Subject: correspondence for W15a

From: Melinda Cotton [<mailto:mbcotton@hotmail.com>]
Sent: Thursday, August 02, 2018 11:23 AM
To: Huckelbridge, Kate@Coastal
Cc: Posner, Chuck@Coastal
Subject: A couple of Questions Re: CCC staff report for the LCP amendment related to BOMP project

Hello Kate,

Thank you for sending this out to all of us. I think you and your Coastal Commission staffers have done a great job in correcting and adding to the City's LCP amendment related to the BOMP project. We really appreciate all the research and effort you have put in to try to protect the wetlands, even though I know you recognize the remaining dangers of earthquake, sea level rise and climate change.

There are a couple of things I would like to ask about: 1. Visual blight of 160' & 120' oil rigs and 2. Highly controversial extension of Shopkeeper Road to Studebaker:

1. I saw no reference to the visual blight of tall oil drilling rigs required at two main entrances to the City -- on both the LCWA site and the Pumpkin Patch -- which you pointed out initially in the BOMP EIR. In your official Comments (copied below) you asked for 'visual simulations' and said 'the rigs [should] be considered a permanent impact because [they] will be there 11-14 years'. The EIR ignored your comments and the EIR Response was essentially: "Because they will continue to be moved around the site during this time, by definition this equipment is considered temporary."

These seem important points. The City Council has made a huge point about wanting the 'Main Entrances' to the City to be improved and beautiful - but 160' and 120' oil rigs on PCH and at 2nd & Studebaker at the entry of the City will be a constant reminder to visitors and residents alike that "oil rules" our City (not protecting Wetlands and Coastal Resources). I tried to point this out at Council hearings, but as the EIR provided no details/visuals because this was 'temporary' I was ignored. I'd like to see the Commission deal with these serious Aesthetic concerns.

Below from you original Comment letter (Sept 15, 2017):

Aesthetics

11. Please include the drilling equipment (160 and 120 foot rigs) in addition, we recommend that the visual impact from the rigs be included in the assessment because the drilling rig will be there for 11-14 years and be used throughout the project life.
12. P. 3.1-30. The DEIR states that the drilling rig not a permanent feature with this assessment. The drilling rig will be on site for 11-14 years, placed in different areas around the site. The redrilling rig will be used for 11-14 years, and could be used frequently.

2. The CCC Staff Report states (*Subarea 25b Pumpkin Patch, page 17*): "The developers shall contribute on a fair share basis to participate in the cost of constructing the connection between Studebaker Road and Westminster Avenue, 2nd Street and Pacific Coast Highway if approved by the City and Shopkeeper Road in accordance with a plan approved by the City. The amount of that participation to be calculated to be the length in feet of property fronting on each side of said roadway multiplied by the average cost per linear foot of constructing one lane of said roadway, to the satisfaction of the City Engineer."

Kate, the topic of extending Shopkeeper Road along the Wetlands and connecting to Studebaker Road is highly controversial - as the current use of that property (buildings, etc.) mean a safe, viable legal road extension would have to carve out Wetlands area to be constructed. The sentence in your Staff Report implies that this project has been approved by Coastal Commission and would only need City approval. I don't believe that is the case. Coastal Commission consideration and action is critical (in the minds of those in the environmental community) before any extension of Shopkeeper Road should be considered, much less approved.

Again, thanks for being so careful and responsive.

Sincerely, Melinda Cotton

From: Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov>
Sent: Friday, July 27, 2018 2:49 PM
To: Huckelbridge, Kate@Coastal
Subject: CCC staff report for the LCP amendment related to BOMP project

All,

The CCC staff report for the City of Long Beach LCP amendment related to the BOMP project has been published. You can find it here: <https://www.coastal.ca.gov/meetings/agenda/#/2018/8>.

Scroll down to Item 15a (on Wednesday). Please let me know if you have any questions.

Kate

Kate Huckelbridge, PhD
California Coastal Commission
Energy, Ocean Resources & Federal Consistency Division
45 Fremont St. Ste. 2000
San Francisco, CA 94105
415-396-9708



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Tagab, Clarita@Coastal

From: Huckelbridge, Kate@Coastal
Sent: Thursday, August 02, 2018 2:53 PM
To: Tagab, Clarita@Coastal
Subject: correspondence for W15a
Attachments: WATER BOARD DOGGR MOA NEW MOA rs2018_0036_with_moa.pdf

From: Johntommy Rosas [mailto:tattnlaw@gmail.com]
Sent: Wednesday, August 01, 2018 2:49 PM
To: Ainsworth, John@Coastal; Delaplaine, Mark@Coastal; Teufel, Cassidy@Coastal; Henry, Teresa@Coastal; Huckelbridge, Kate@Coastal
Subject: Re: TATTN/JTR DECLATORY TESTIMONY FOR THE CCC AUG 8 2018 HEARING ITEMS

please add this to the exhibits/ evidence and CCC staff report for los cerritos lcp etc see attached -

The State Water Resources Control Board (State Water Board) and the Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) have signed the Revised Memorandum of Agreement between the State Water Board and DOGGR regarding underground injection control, discharges to land, and other program issues (2018 Revised MOA).

A copy of the 2018 Revised MOA and associated attachments can be found on the State Water Board's Oil and Gas website at:
https://www.waterboards.ca.gov/water_issues/programs/groundwater/sb4/announcements.html
thanks jt

On Tue, Jul 31, 2018 at 10:41 AM Johntommy Rosas <tattnlaw@gmail.com> wrote:

Please see attached it includes 3 hearing items comments ,
please make the sure the Commissioners receive a copy as well -thanks jt

--

JOHN TOMMY ROSAS
TRIBAL ADMINISTRATOR
TRIBAL LITIGATOR -TATTN JUDICIAL # 0001
TONGVA ANCESTRAL TERRITORIAL TRIBAL NATION
A TRIBAL SOVEREIGN NATION UNDER THE UNDRIP AND AS A TREATY [s] SIGNATORIES RECOGNIZED TRIBE, WITH HISTORICAL & DNA AUTHENTICATION ON CHANNEL ISLANDS AND COASTAL VILLAGES - AND AS A CALIFORNIA NATIVE AMERICAN TRIBE / SB18-AB 52-AJR 42-ACHP/NHPA - CALIFORNIA INDIANS JURISDICTIONAL ACT U S CONGRESS APPROVED MAY 18, 1928 45 STAT. L 602

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JOHN TOMMY ROSAS
TRIBAL ADMINISTRATOR
TRIBAL LITIGATOR -TATTN JUDICIAL # 0001
TONGVA ANCESTRAL TERRITORIAL TRIBAL NATION

A TRIBAL SOVEREIGN NATION UNDER THE UNDRIP AND AS A TREATY [s] SIGNATORIES RECOGNIZED TRIBE, WITH HISTORICAL & DNA AUTHENTICATION ON CHANNEL ISLANDS AND COASTAL VILLAGES - AND AS A CALIFORNIA NATIVE AMERICAN TRIBE / SB18-AB 52-AJR 42- ACHP/NHPA - CALIFORNIA INDIANS JURISDICTIONAL ACT U S CONGRESS APPROVED MAY 18, 1928 45 STAT. L 602

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**STATE WATER RESOURCES CONTROL BOARD
RESOLUTION NO. 2018-0036**

AUTHORIZING THE EXECUTIVE DIRECTOR TO FINALIZE AND EXECUTE A REVISED
MEMORANDUM OF AGREEMENT BETWEEN THE STATE WATER RESOURCES CONTROL
BOARD AND THE DEPARTMENT OF CONSERVATION, DIVISION OF OIL, GAS, AND
GEOTHERMAL RESOURCES REGARDING UNDERGROUND INJECTION CONTROL,
DISCHARGES TO LAND, AND OTHER PROGRAM ISSUES

WHEREAS:

1. The existing Memorandum of Agreement (MOA) between the State Water Resources Control Board (State Water Board) and the Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR), executed in 1988 (1988 MOA), calls for DOGGR to consult with the State Water Board and the regional water quality control boards (collectively Water Boards) during its consideration of Class II underground injection control (UIC) project and permit applications and for the Water Boards to consult with DOGGR during its consideration of waste discharge requirements for discharges of produced water from oil and gas operations.
2. The 1988 MOA provides that the MOA may be modified upon the initiative of either the State Water Board or DOGGR for the purpose of ensuring consistency with state and federal statutes or regulations, or for any other purposes mutually agreed upon.
3. Staff from DOGGR and the Water Boards have met several times over the last two years to update the 1988 MOA, and have produced the draft revised MOA (2018 MOA).
4. In response to increased involvement of the legislature, the Governor's office, the U.S. Environmental Protection Agency, oil and gas operators, and the public, the Water Boards' role in the review of UIC project and aquifer exemption proposals has evolved and expanded.
5. The 2018 MOA reflects how the Water Boards and DOGGR coordinate in administering the state's UIC program, regulating discharges of produced water from oil and gas operations, respond to incidents such as spills, taking enforcement actions, and handling other related issues.
6. The 2018 MOA provides a coordinated approach resulting in a single permit satisfying the statutory obligations of DOGGR and Water Boards and ensuring that the injection of Class II fluids and discharges to land of produced water from oil and gas operations do not cause degradation of waters of the State.
7. State Water Board staff consulted with the regional water quality control boards oil and gas program staff, sought comments from industry groups and non-governmental organizations, and provided a 30-day period for the public to comment on the 2018 MOA. The written comments were due by June 25, 2018. Staff have reviewed and considered public comments.

8. The execution of the 2018 MOA is not a project under the California Environmental Quality Act (Public Resources Code section 21000 et seq.) because it is not an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.

THEREFORE BE IT RESOLVED THAT:

1. The State Water Board authorizes its Executive Director to modify as warranted, finalize and execute the attached 2018 Revised MOA.
2. The State Water Board further authorizes its Executive Director to execute future revisions to the 2018 MOA between the State Water Board and DOGGR, provided that the Executive Director shall bring the following matters to the attention of the members of the State Water Board by appropriate communication prior to taking action:
 - 2.1. Matters of a unique or unusual nature;
 - 2.2. Matters that appear to depart from the policies of the State Water Board;
 - 2.3. Matters involving significant policy questions;
 - 2.4. Highly controversial matters;
 - 2.5. Any matter that a Board Member requests to be brought to the attention of the State Water Board; and
 - 2.6. Any matter that, in the judgment of the Executive Director, should be brought to the attention of the State Water Board.

CERTIFICATION

The undersigned Clerk to the Board does hereby certify that the foregoing is a full, true, and correct copy of a resolution duly and regularly adopted at a meeting of the State Water Resources Control Board held July 24, 2018

AYE: Board Member Tam M. Doduc
Board Member Dorene D'Adamo
Board Member E. Joaquin Esquivel
NAY: None
ABSENT: Chair Felicia Marcus
Vice Chair Steven Moore
ABSTAIN: None



Jeanine Townsend
Clerk to the Board

REVISED MEMORANDUM OF AGREEMENT
BETWEEN THE
STATE WATER RESOURCES CONTROL BOARD
AND THE
DEPARTMENT OF CONSERVATION
DIVISION OF OIL, GAS AND GEOTHERMAL RESOURCES
REGARDING
UNDERGROUND INJECTION CONTROL, DISCHARGES TO LAND, AND OTHER PROGRAM ISSUES

I. PURPOSE

This Memorandum of Agreement ("MOA") between the State Water Resources Control Board ("Board" or "State Water Board") and the Department of Conservation Division of Oil, Gas and Geothermal Resources ("Division") (collectively, the "Parties") is a revision of the 1988 Memorandum of Agreement ("1988 MOA") signed by the Parties. The 1988 MOA provides that:

The agreement may be modified upon the initiative of either party for the purpose of ensuring consistency with State or Federal statutes or regulations, or for any other purpose mutually agreed upon. Any such modifications must be in writing and must be signed by the Director of the Department of Conservation, the State Oil and Gas Supervisor, and the Chairman of the SWRCB.

The revisions to the 1988 MOA serve to reflect developments in how the Parties coordinate in administering the state's Underground Injection Control ("UIC") program for Class II ~~fluids~~fluidswells, regulating discharges to land of produced water from oil and gas operations, responding to incidents such as spills, taking enforcement actions, and handling other related issues. The procedures described herein are intended to provide a coordinated approach resulting in a single permit satisfying the statutory obligations of both parties and to ensure that injection of fluids in Class II fluidswells and discharges of ~~Class II fluids~~fluids produced water from oil and gas operations to land do not cause degradation of waters of the State of California.

II. SCOPE

The following procedures have been formulated and adopted by the Division and Board to: (1) achieve coordination of activity; (2) simplify reporting of proposed waste discharges by oil and gas operators; and, (3) eliminate duplication of effort among the State agencies. As far as the Parties are concerned, the method of reporting proposed underground injection and discharges to land will be uniform throughout the State.

The following procedures will not generally be applicable to the injection ~~or discharge to land of wastes other than produced water and of fluids in wells other than Class II wells~~as Class II or discharges to land of ~~wastes other than produced water from oil and gas operations~~. Other discharges (e.g., refinery wastes) must be issued waste discharge requirements or waivers through the appropriate regional water board (Water Code, Division 7, Chapter 4). Such discharges will not be subject to regulation by the Division unless the subject disposal well is within the administrative limits of an oil field. In such case, the Division must also issue a permit for the

well construction. (Public Resources Code Sections 3008 and 3203.) The conditions of this permit should be in agreement with applicable waste discharge requirements.

III. OVERVIEW OF STATUTORY AUTHORITY

A. Division

Chapter 1 (Oil and Gas Conservation) of Division 3 (Oil and Gas) of the Public Resources Code (commencing with section 3000) ("Chapter 1") governs oil and gas activities in the State. Chapter 1 establishes the Division as the principal state agency charged with regulating the drilling, operation, maintenance, and abandonment of oil and gas wells ~~on land not held by the federal government~~. The State Oil and Gas Supervisor supervises these activities on behalf of the Division as well as the operation, maintenance, and removal or abandonment of tanks and facilities attendant to oil and gas production. Such supervision is "to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil and gas deposits from infiltrating water and other causes; loss of oil, gas, or reservoir energy, and damage to underground and surface waters suitable for irrigation or domestic purposes by the infiltration of, or the addition of, detrimental substances." (Pub. Resources Code, § 3106, subd. (a).)

In regulating oil and gas activities and related facilities to protect the public and environment, the Division's regulatory powers include, but are not limited to: (1) issuing permits or approvals for oil and gas activities, such as the drilling or abandonment of wells; (2) investigating the environmental conditions and inspecting facilities associated with oil and gas activities and preparing related reports; (3) ordering and/or undertaking tests or remedial work; and (4) issuing enforcement orders for violations of applicable oil and gas law and permits or approvals.

In September 1982, the Division received primacy from US EPA pursuant to the provisions of Section 142S(a) of the federal Safe Drinking Water Act that gives the Division additional authority and responsibility to regulate Class II wells in the State. Class II wells are used to inject fluids into the subsurface that are related to oil and gas production. (See 40 C.F.R. § 144.6(b).)

B. State Water Board

The State Water Board and nine regional water boards ("Water Boards") are the principal state agencies with primary responsibility to coordinate and control surface water and groundwater quality in the State. The legal authority of the State Water Board and regional water boards generally extends to regulating any activity or factor(s) that may affect the quality of the waters of the state and includes the prevention and correction of water pollution and nuisance. The Water Boards derive their authority primarily from, and must exercise their authority in accordance with, the State Porter-Cologne Water Quality Control Act (Wat. Code, § 13000 et seq.) and, where applicable, the federal Clean Water Act (33 U.S.C. § 1251 et seq.) and its implementing regulations. The Solid Waste Disposal Regulatory Reform Act of 1993 (Pub. Resources Code, § 43100 et seq.) provides additional authority for the State Water Board and the regional water boards to regulate the disposal of solid waste for the purpose of protecting the waters of the state.

The regulatory powers of the Water Boards related to water quality include, but are not limited to: (1) designating the beneficial uses of groundwater and surface waters and establishing water quality objectives to protect the uses; (2) investigating water quality issues, for example, by requiring water quality monitoring and reporting; (3) adopting water quality control plans, regulations, and policies; (4) issuing

waste discharge requirements (“WDRs”) that regulate discharges of “waste”¹ that may affect the quality of the “waters of the state”²; (5) conditionally waiving the requirement to file a report of waste discharge (“ROWD”) and obtaining WDRs for certain discharges, such as low-threat discharges; (6) prohibiting types of waste discharges and/or waste discharges in certain locations; (7) issuing enforcement orders; and (8) receiving information from, and providing information to, governmental agencies and the public regarding water quality issues.

IV. RESPONSIBILITIES AND REQUIREMENTS REGARDING UNDERGROUND INJECTION CONTROL

The Division and State Water Board shall have the following responsibilities and requirements regarding UIC and UIC-related activities:

A. Aquifer Exemptions

1. Upon completing a proposal to exempt an aquifer or to expand an existing aquifer exemption under the federal Safe Drinking Water Act (hereafter “aquifer exemption”), the Division shall forward a copy of the data submitted in support of the aquifer exemption request to the State Water Board. The Division shall notify the State Water Board and appropriate regional water board of, and provide, any additional information that the Division receives during the request review process. The Water Boards shall notify the Division of, and provide, any additional information that the Water Boards receive during the request review process.
2. During the review of the aquifer exemption request, the Division, the State Water Board, and the appropriate regional water board shall consult with one another, and may require the requestor to submit additional information to demonstrate that the proposed aquifer exemption and the injection into the aquifer(s) or portion of the aquifer(s) at issue meets the requirements of § 146.4 of Title 40 of the Code of Federal Regulations (CFR) and California Public Resources Code (PRC) § 3131.³
3. Prior to submitting a proposed aquifer exemption for public comment and hearing, the Division and State Water Board, in collaboration with the appropriate regional water board, must preliminarily determine that the proposed aquifer exemption and proposed injection into the aquifer(s) or portion of the aquifer(s) at issue meet the criteria of 40 CFR § 146.4 and PRC § 3131. If, after (1) a 30-day comment period, (2) a joint public hearing by the Division and State Water Board, and (3) considering public comments, the State Water Board, in collaboration with the appropriate regional water board, concurs with a determination by the

¹ “Waste” includes “sewage and any other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal origin, or from any producing, manufacturing, or processing operation, including waste placed within containers of whatever nature prior to, and for the purposes of, disposal.” (Wat. Code, § 13050, subd. (d).)

² “Waters of the state” means any surface water or groundwater, including saline waters, within the boundaries of the state.” (Wat. Code, § 13050, subd. (e).)

³ If the state or federal regulatory criteria for evaluating an aquifer exemption (i.e., PRC § 3131 and 40 CFR § 146.4) proposal are modified, those modified criteria will apply in this section and any other section in which aquifer exemption regulatory criteria are referenced.

Division that the criteria of 40 CFR § 146.4 and PRC § 3131 are satisfied, the Division may submit the request to the US EPA for final determination.

4. In connection with any concurrence described in the preceding section (Section IV.A.3), the State Water Board, in collaboration with the appropriate regional water board, and the Division shall consult with one another regarding conditions to be considered for incorporation into any new or revised UIC project approved by the Division for injection into aquifer(s) exempted pursuant to this memorandum in order to address any water quality concerns. Conditions to be considered may include, but are not limited to, requiring groundwater monitoring to ensure injected fluids do not migrate out of the approved injection zone, requiring hydraulic controls, incorporating a buffer zone between the injection zone and the aquifer exemption boundary, and collecting water samples to determine baseline quality.
5. In connection with any concurrence described in Section IV.A.3, the State Water Board, in collaboration with the appropriate regional water board, shall consult with the Division regarding any proposed limitation(s) to be incorporated into any new or revised UIC project approved by the Division for injection into aquifer(s) exempted pursuant to this memorandum in order to address water quality concerns. A limitation is a condition the State Water Board or regional water board deems necessary to incorporate into all new and revised UIC projects into exempted aquifer(s) in order to address water quality concerns (e.g., limiting injection volumes or rates, restricting the quality of the injectate, and restricting the type of injection into an aquifer). If the State Water Board and the Division agree upon the limitation(s) proposed by the State Water Board, and the State Water Board issues a letter of concurrence identifying the limitation(s), the Division will incorporate the limitation(s) into all new and revised UIC project approval letters involving projects in the aquifer(s) at issue.
6. The Division and the Water Boards will develop a system for tracking progress on the review of aquifer exemption proposals. The system shall be accessible to and duly maintained by the Division, the State Water Board, and the regional water boards.
- ~~6.7.~~ To the extent that the Division, State Water Board, or a regional water board considers that the status of an existing aquifer exemption should be reviewed for consistency with the requirements of 40 CFR § 146.4 and PRC § 3131, such Party may consult with the other regarding potential modification or rescission of the exemption and/or modification or rescission of injection projects in the exempted area(s) at issue.

B. UIC Projects

1. Upon (1) completing the review of an application for a new UIC project or an application to modify an existing UIC project or (2) engaging in a review of an existing project as part of a comprehensive periodic project review process, the Division shall forward a copy of the information associated with the project, as specified in the appendix (or some portion of the information as agreed upon), to the State Water Board and appropriate regional water board. The Division shall notify the State Water Board and appropriate regional water board of, and provide, any additional information described in the appendix that the Division subsequently receives during the application / project review process. The State Water Board or regional water board may also request from the Division additional information relevant to protecting

or monitoring water quality. The Division may invite State Water Board and regional water board staff to attend meetings with operators regarding projects under review.

2. In conjunction with a review of an existing project or review of an application for a new or modified project, the State Water Board and regional water board may consult with the Division regarding the evaluation of potential impacts on water quality. Upon receiving the UIC project information specified in the appendix, the State Water Board or the regional water board shall notify the Division as to whether ~~they~~ the Water Boards intend to comment on the application or existing project under review. The notification of intent to comment shall include an estimate of the amount of time the ~~State Water Board and regional water board~~ Boards will need to provide comments or questions on the UIC project. The project review process is described in greater detail below and in the appendix.
 - a. The ~~State Water Board and regional water board~~ Boards shall consult with the Division regarding potential provisions to incorporate into project approvals to protect water quality. The ~~State Water Board or regional water board~~ Boards may submit comments that recommend that the Division add provisions to a UIC project under review to address the ~~State Water Board's or regional water board's~~ Boards' concerns pertaining to the protection or monitoring of water quality. Provisions may include, among others, limitations and conditions identified by the State Water Board in a concurrence issued for an aquifer exemption proposal for the aquifer(s) at issue in the project under review. Provisions may also include conditions to be incorporated into the project in order to protect water that is, or may reasonably be, used for any beneficial use. See Section IV.A.4 for examples of such conditions. The ~~State Water Board and regional water board~~ Boards may submit comments recommending the Division either disapprove a proposed project or rescind an approval for a UIC project.
 - b. The Division shall consult with the State Water Board and regional water board regarding any limitation(s) identified in an aquifer exemption letter of concurrence issued by the State Water Board if a new or revised UIC project is proposed into the aquifer(s) at issue in the concurrence letter. Upon confirmation by the Division that the injection zone(s) at issue in the UIC project are subject to the limitation(s) identified in the concurrence letter, the Division will incorporate the limitation(s) into the project approval letter unless there is agreement between the Division and Water Boards that such limitation(s) should not apply.
 - c. The Division shall consider all comments from the State Water Board and regional water board, including those related to project conditions and limitations, prior to issuing a project approval letter. The Division may consult with the State Water Board and regional water board regarding comments on a project under review.
 - d. If a project approval letter incorporates limitations or conditions proposed by the Water Boards to protect water that is, or may reasonably be, used for any beneficial use, those provisions will be noted as "Water Quality Requirements" and will specify the mechanism for monitoring and enforcing operators' compliance with the requirements.
 - e. The Division shall provide a copy of the unsigned final draft project approval letter to the State Water Board and regional water board at least five business days prior to issuing a final project approval letter to an operator. If the State Water Board or regional water

board identify any concerns with the unsigned final draft project approval letter before it is signed and issued, the Division will not issue the letter and will consult with the Water Boards regarding those concerns.

- f. If the ~~State Water Board and regional water board~~Boards find that the terms of the draft project approval letter adequately address any concerns raised and adequately protect water that is, or may reasonably be, used for any beneficial use, the State Water Board or regional water board will provide written communication to the Division indicating that the Water Boards have no objections to the issuance of the project approval letter. If the State Water Board or regional water board find that the terms of the draft project approval letter do not adequately address the concerns raised or adequately protect water that is, or may reasonably be, used for any beneficial use, the State Water Board or regional water board may request further consultation with the Division, or may provide written communication to the Division indicating that the Water Boards object to the project approval letter.
 - g. The Division will provide the State Water Board and regional water board with a copy of the signed, final project approval letter.
3. The Water Boards shall have primary responsibility for evaluating and approving water quality monitoring plans and administering approved monitoring plans associated with UIC projects. A requirement to conduct water quality monitoring may be included in a project approval letter issued by the Division or pursuant to an order issued by a regional water board under section 13267 of the Water Code.
 4. The Division and the ~~State Water Board~~Boards will ~~work together to~~ develop a ~~centralized~~ system for tracking progress on the review of UIC project applications and UIC project reviews. The system shall be accessible to and duly maintained by the Division, the State Water Board, and the regional water boards.

V. RESPONSIBILITIES AND REQUIREMENTS REGARDING DISCHARGES OF ~~CLASS II FLUIDS~~PRODUCED WATER TO LAND

A. Waste Discharge Requirements and Waivers

1. Upon receiving a Report of Waste Discharge (an application for a permit to discharge waste or ROWD) that involves ~~Class II fluids (e.g., the discharge of~~ produced water from oil and gas operations~~), to land,~~ the regional water board shall notify the Division of the receipt of the ROWD and shall forward a copy of the ROWD (or some portion thereof as agreed upon) to the Division upon its request.
2. The regional water board shall notify the Division of any additional information that the regional water board subsequently receives during the review of the ROWD. The Division may request from the regional water board additional information related to the ROWD. The regional water board may invite Division staff to attend meetings with operators regarding a ROWD under review.

3. In conjunction with a review of a ROWD, the Division may consult with and provide comments to the regional water board. The regional water board shall consider all comments from the Division prior to circulating any draft Waste Discharge Requirements or waiver of WDRs to the public.
4. The regional water board shall provide to the Division any draft WDRs or waiver of WDRs that are circulated to the public for review. The Division may recommend that the regional water board add provisions to any draft WDRs or waiver of WDRs. The regional water board shall consider all comments from the Division. If the Division finds that the terms of the draft WDRs or waiver of WDRs do not adequately address the Division's comments, the Division may request further consultation with the regional water board, or may provide written communication to the Water Board indicating that the Division objects to the draft WDRs or waiver of WDRs.
5. The regional water board will furnish a copy of the final WDRs or waiver of WDRs to the Division.

VI. INCIDENT RESPONSE AND ENFORCEMENT COORDINATION

A. Incident Response

1. The State Water Board and regional water boards shall be primarily responsible for overseeing water quality monitoring and the investigation and cleanup of leaks, spills, and other unauthorized discharges to waters of the state in the context of all oil and gas production activities and surface storage and disposal of related fluids. In some cases, the State Water Board and the local regional water board may defer to another local, state, or federal agency that takes primary responsibility for investigation and cleanup of the leak, spill, or other unauthorized discharge as described above. The Division shall assist as appropriate, including as this MOA, other agreements between the Parties, or applicable law may require.
2. The Division shall immediately inform the State Water Board and the appropriate regional water board when it becomes aware of any potential or actual water quality violations or any surface or sub-surface discharge of fluids associated with oil and gas production activities or surface storage or disposal of related fluids that has potential or actual impacts on surface or groundwater quality. Such discharges include, but are not limited to, any discharge to waters of the State or waters of the U.S., discharges to land that pose a potential or actual threat to surface or groundwater quality, and sub-surface discharges that pose a potential or actual threat to groundwater quality (resulting from, for example, well failure or a failure of zonal isolation). The Division shall also inform the State Water Board and appropriate regional water board when the Division initiates an investigation related to any such surface or sub-surface discharge. If an investigation results in the issuance of a report, the Division shall make any such report available to the State Water Board and the appropriate regional water board upon request. Any portion of a report that might disclose protected information (e.g., trade secrets or other confidential information) shall be made available to the State Water Board and/or regional water board for its use in regulating operations associated with oil and gas production activities consistent with applicable law. The State Water Board and/or regional water board

shall not disclose the protected information to the public or other governmental agencies except as authorized or required by law and consistent with this MOA.

3. The Water Boards shall immediately inform the Division when they become aware of any potential or actual water quality violations or any surface or sub-surface discharge of fluids associated with oil and gas production activities or surface storage or disposal of related fluids that has potential or actual impacts on surface or groundwater quality. If the State Water Board or a regional water board issues an order related to any such surface or sub-surface discharge, the Water Boards shall make the order and any resulting reports available to the Division upon request. Any portion of a report that might disclose protected information (e.g., trade secrets or other confidential information) shall be made available to the Division for its use in regulating operations associated with oil and gas production activities consistent with applicable law. The Division shall not disclose the protected information to the public or other governmental agencies except as authorized or required by law and consistent with this MOA.
4. The Division and the Water Boards will cross-train each other's staff, as the Parties deem appropriate, to enhance investigations designed to ensure compliance with UIC projects and permits and applicable law.

B. Enforcement Coordination

1. If the Division, State Water Board, or regional water board determines that there is a violation of water quality-based statutory or regulatory requirement, the agency ~~may~~shall take any actions under its authority that the agency deems appropriate to ensure that compliance is achieved.
2. The Division and Water Boards will coordinate incident response, investigations, and enforcement actions and hearings to the extent appropriate. Where feasible, prior to ordering or otherwise requiring that remedial or preventative action be taken to address water quality issues, including, but not limited to, pollution and nuisance, the Water Boards may consult with the Division regarding the actions to be required. Where feasible, prior to ordering or otherwise requiring that remedial or preventative action be taken that may affect water that is, or may reasonably be, used for any beneficial use, the Division may consult with the State Water Board and the appropriate regional Board.
3. Nothing in this MOA shall be construed as precluding the Parties from taking independent enforcement actions or from responding timely to an emergency, such as an ongoing or imminent threat to public health, safety, or the environment.

VII. ADDITIONAL PROVISIONS AND AGREEMENTS

A. Information Sharing

1. For the purpose of regulating UIC and UIC-related activities, the Division and Water Boards may share or exchange information in a manner that is consistent with the Public Records Act (Gov. Code, § 6250 et seq.) and any other applicable law. The information that may be shared or exchanged includes, but is not limited to, information that is subject to confidential well status

pursuant to Public Resources Code section 3234 and information that is subject to protection as a trade secret.

2. Any information shared or exchanged between or among Parties that the transmitting Party deems protected from public disclosure shall include a written advisory to that effect (e.g., include "Confidential" in the subject line of the transmitting electronic mail). As used in this MOA, "Confidential Communication" refers to such information transmitted with the written advisory.
3. Only persons authorized in writing by the Director of the Department of Conservation, the Executive Director of the State Water Board or the Executive Officer of a regional water board (as applicable) shall be permitted to obtain Confidential Communications.
4. Except by written agreement, or as required by court order, neither the Division nor the Water Boards shall release, disclose, discuss, or otherwise make available to the public any Confidential Communication or any other information which the Public Records Act or any other applicable law protects from public disclosure.
5. A Party that receives a request from a non-Party to release, disclose, discuss, or otherwise obtain access to any Confidential Communication (whether by way of subpoena, discovery request, request under the California Public Records Act, or other federal or state law) shall notify the transmitting Party that deemed the information protected of the request before the date on which a response to such a request is due, with the goal of providing the notice at least five calendar days before the response deadline. Unless the transmitting Party consents to disclosure or release of the Confidential Communication, the Party that received the disclosure request shall assert all relevant privileges and other objections to the disclosure to the extent authorized by law and subject to any court orders.

B. Resolution of Technical Questions and Policy Issues

1. Management of the programs described in this MOA involves the evaluation of numerous complex technical questions. In the event of a disagreement between Division and Water Boards staff, staff will refer the matter to their respective supervisors for cooperative resolution. If no agreement is reached, the matter will be sequentially escalated to corresponding levels of agency management for resolution.
2. All technical reports, work plans, and other documents prepared by regulated entities (e.g., Class II well operators), consultants or other third parties, the Division, or Water Boards that involve planning, investigation, evaluation, or design, or other work requiring interpretation and proper application of engineering or geologic sciences, shall be signed and stamped by a registered professional ~~as to the extent~~ required by California Business and Professions Code sections 6735, 7835, and 7835.1. In the event of a disagreement about whether or how these requirements apply, advice shall be solicited from the Board of Professional Engineers, Land Surveyors, and Geologists as appropriate, and the approach outlined in Paragraph 1 above will be employed.

C. Other Responsibilities and Requirements

1. The Division and Water Boards shall have any other responsibilities and requirements as set forth in the Safe Drinking Water Act and other statutes, regulations, and orders.
2. Any responsibility or requirement set forth in this MOA that is inconsistent with any regulation of the Division or Water Boards shall be inoperative and not take effect unless and until the regulation is repealed or revised in a manner that provides consistency with this MOA.

D. Reservation of Authority

1. Nothing in this MOA shall be construed as delegating, limiting, or expanding the authority of the Division or Water Boards in carrying out their respective legal responsibilities for the management, regulation, coordination, and control of UIC activities, UIC-related activities, and discharges of UIC-related fluids to land.
2. Nor shall anything in this MOA be construed as affecting the discretion of the Division or Water Boards in carrying out their respective legal responsibilities for the management, regulation, coordination, and control of UIC, UIC-related activities, and discharges of UIC-related fluids to land.
3. This MOA is not a regulation nor does it create binding obligations for either Party.

E. No Third-Party Beneficiaries

1. This MOA is not intended for the benefit of any person or entity other than the Parties. Third-parties cannot enforce any provision of this MOA.

F. Execution, Term, and Modification

1. This MOA represents the entire agreement of the Parties and merges and supersedes any prior written or oral representations, discussions, understandings, or agreements by, between, or among the Parties relating to the subject matter of this MOA, including the 1988 Memorandum of Agreement Between the State Water Resources Control Board and the Department of Conservation Division of Oil and Gas, but excluding the 2014 Memorandum of Agreement Among the Department of Conservation Division of Oil, Gas, and Geothermal Resources and State Water Resources Control Board and Regional Water Quality Control Boards Regarding Well Stimulation Treatments and Well Stimulation Treatment-Related Activities.
2. The Parties may execute this MOA in counterparts. Each executed counterpart shall have the same force and effect as an original instrument. Taken together, the executed counterparts shall constitute one and the same agreement.
3. This MOA shall become effective upon the date of final signature of the Parties.
4. This MOA shall continue in effect until modified by the mutual consent of the Parties or until terminated by a Party upon a 30-day advance written notice to the other Party.
5. The appendix to this MOA may be modified at any time by mutual agreement of the State Oil and Gas Supervisor and Executive Director of the State Water Board.

G. Construction

1. Any determination that a provision of this MOA is invalid does not invalidate any other provision of this MOA or the MOA in its entirety.

H. Representation on Authority

1. Each Party represents and warrants that it has the right, power, and authority to execute this MOA. Each Party represents and warrants that it has given any and all notices, and obtained any and all consents, powers, and authorities necessary to permit it, and the persons executing this MOA for it, to enter into this MOA.

VIII. SIGNED AND DATED

DAVID BUNN
Director
CALIFORNIA DEPARTMENT OF CONSERVATION

Date

KENNETH A. HARRIS JR.
State Oil and Gas Supervisor
DIVISION OF OIL, GAS, AND GEOTHERMAL
RESOURCES

Date

EILEEN SOBECK
Executive Director
STATE WATER RESOURCES CONTROL BOARD

Date

**Revised Memorandum of Agreement Between the State Water Resources Control Board and the
Department of Conservation Division of Oil, Gas and Geothermal Resources Regarding
Underground Injection Control, Discharges to Land, and Other Program Issues**

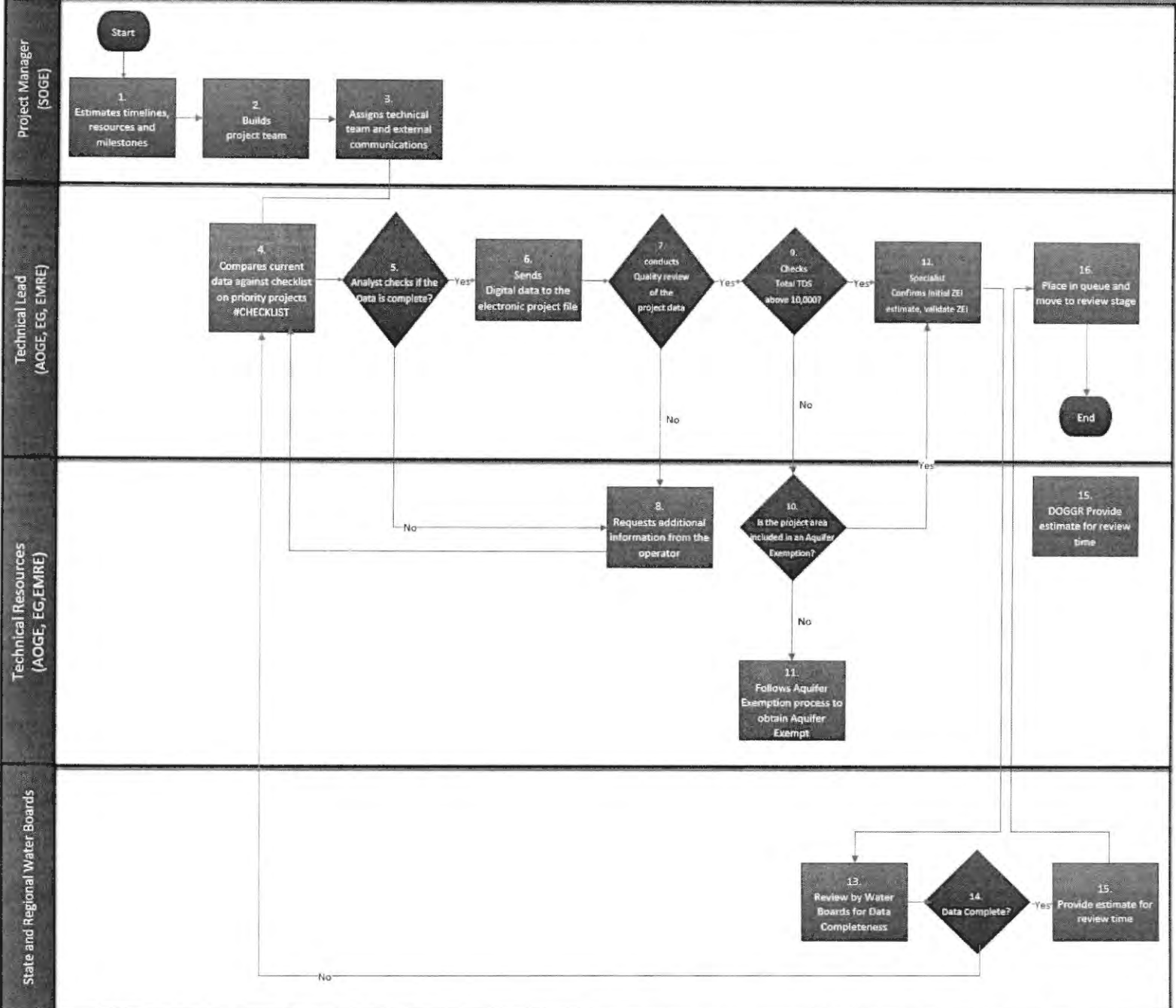
Appendix

- Attachment 1 – UIC Project Review Process (“Flowchart”)
- Attachment 2 – UIC Project Data Requirements (“Checklist”)

Attachment 1

Title: UIC Project Review Process - Project Initiation
 Date: May 18, 2018 B. Bartling
 Project Support Office: J. Newton & P. Ajiduah

High Level



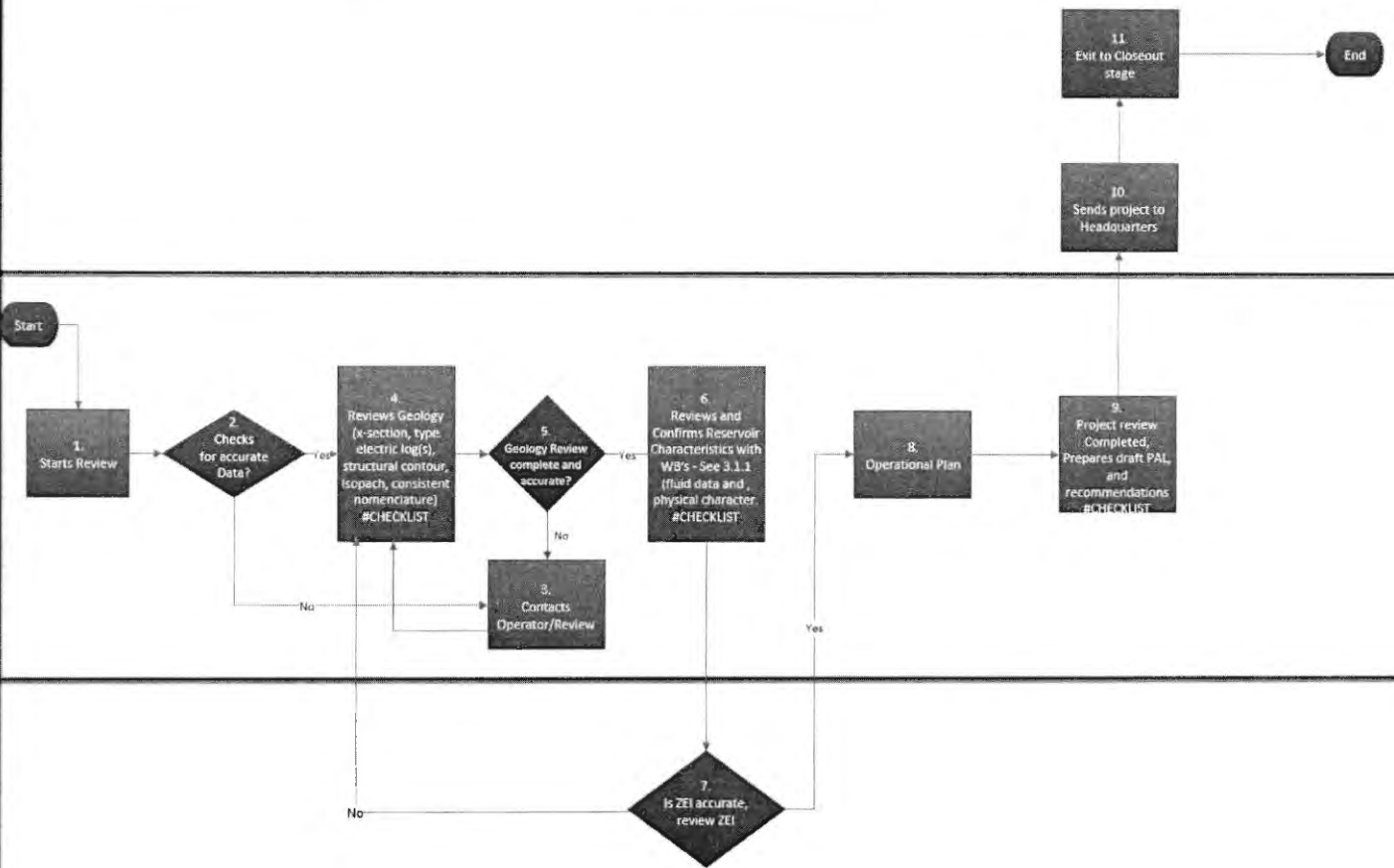
Title: UIC Project Review Process - Technical Review
Date: May 18, 2018 B. Bartling
Project Support Office: J. Newton & P. Ajiduah

High Level

Project Manager
(SQE)

Technical Lead
(AOGE, EG, EMRE)

Technical Resource
(AOGE, EG, EMRE)

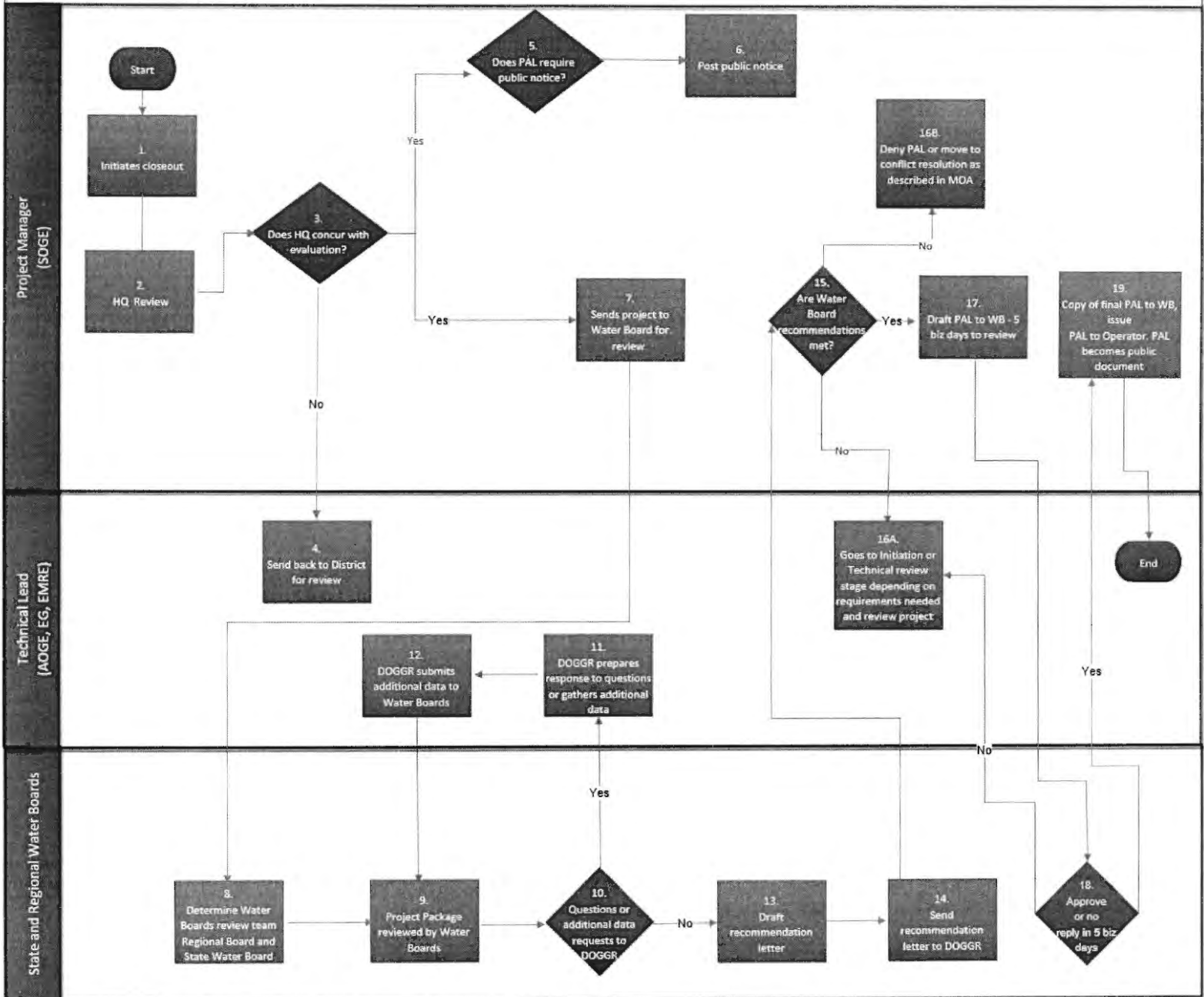


Title: UIC Project Review Process - Project Closeout

Date: May 18, 2018 B. Bartling

Project Support Office: J. Newton & P. Ajiduah

High Level



Attachment 2

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UNDERGROUND INJECTION CONTROL (UIC) PROJECT DATA REQUIREMENTS

Checklist and Approval Memo

Project Category (Project by Project, Periodic Review, New Project, Modified Project):

Project Type (Disposal, Water Flood, Cyclic Steam, Steam Flood)

Number of Wells:

Operator:

Project No.:

Field Name:

Zone:

Reviewing Engineer:

Date Project Submitted:

All data shall be submitted in a Division approved electronic format.

Electronic submission of all subsurface mappable data (structure, isopachous, and Area of Review (AOR)) shall be submitted as a PDF and/or the corresponding geospatial shapefile(s) and grids that can be plotted using GIS, to show the AOR or Project Area determined. The polygons should clearly show the expected path of injectate, for life of the project.

Project Data Requirements

The table below is a non-exclusive checklist of essential data needed for DOGGR and the Water Boards' evaluation of a UIC project under DOGGR's requirements and the Water Boards' requirements.

	Complete	Location in the Data Package
Statement of primary purpose of the project.	☐	

Formation fluid quality determination & Area of Review (AOR)	FA(1)	For ACTIVE water disposal projects, determine current injectate front and pressure front to verify the AOR. ^{1a}	☐	
	FA(2)	For compliance with SDWA, if injection zone is less than 10,000 total dissolved solids (TDS) (underground source of drinking water or USDW) and project area is within an exempt aquifer then, determine the AOR for predicted project life. ^{1a}	☐	
	FA(3)	For compliance with SDWA, if injection zone is less than 10,000 TDS (USDW) and project area is NOT entirely within an exempt aquifer then, submit a shut-in plan for wells outside exempt aquifer and/or submit an aquifer exemption expansion application. ^{1b}	☐	
	FA(4)	If injection zone is greater than 10,000 TDS (non-USDW) then, determine AOR for predicted project life. ^{1a}	☐	
	FA(5)	Submit calculation method with constants used for determining AOR. ^{1:1a, 1b}	☐	

Geologic Study	All maps, diagrams and exhibits required should be clearly labeled as to scale and purpose and shall clearly identify wells, boundaries, zones, contacts, and other relevant data that extend beyond the project area to ensure adequate review of the AOR.			
	GS(1)	Geologic overview of the formation including discussion on vertical (top & bottom seals) and lateral confinement.	☐	
	GS(2)	Structural contour map drawn on a geologic marker at or near the top of each injection zone in the project area as defined by the AOR. The map should show the wellbore paths of all existing and proposed wells in the map area with legible labels. ²	☐	
	GS(3)	Isopach map of each injection zone or subzone in the project area as defined by the AOR. The map should show the wellbore paths of all existing and proposed wells in the map area with legible labels. ²	☐	
	GS(4)	At least two geologic cross sections in the AOR through at least three wells, including one injection well in the project area. ²	☐	

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	GS(5)	Representative electric log (type log) to a depth below the deepest producing zone identifying all geologic units, formations, freshwater aquifers, USDW(s), and oil and gas zones submitted as a PDF. ^{2,3}	☐	
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Engineering Study	ES(1)	Reservoir characteristics of each injection zone, such as porosity, permeability, average thickness, areal extent, fracture gradient, original and present temperature and pressure, and original and residual oil, gas, and water saturations.	☐	
	ES(2)	Reservoir fluid data for each injection zone, such as oil gravity and viscosity, liquid quality, and specific gravity of gas. Formation fluid TDS determination should be from actual samples when available or log derivations may be accepted with submission of LAS logs and all constants used for verification.	☐	
	ES(3)	Wellbore construction data for all wells that penetrate the injection zone and Division permitted water-source wells (that will be used in conjunction with the project) within the project area as defined by the AOR. Include all casing strings/liners with perforated intervals, cement plugs, actual or calculated cement fill behind casing, casing damage/holes (squeezed & unsqueezed), and geologic markers including, but not limited to: injection zone depth(s) freshwater depth(s), and USDW(s). Wellbore construction data shall be submitted in a digital format as designated by the State Oil & Gas Supervisor. ⁴	☐	
	ES(4)	Plugging and/or abandonment program to remediate problem wells that penetrate the injection zone.	☐	
	ES(5)	A planned well-drilling program including a flood-pattern map showing all injection, production, plugged and abandoned wells, unit boundaries, and Division permitted water-source wells that will be used in conjunction with the project.	☐	

Injection Plan	Electronic submission of the injection plan shall be submitted as a PDF and/or the corresponding geospatial shapefile(s) and grids that can be plotted using GIS, to show the Area of Review (AOR) determined.			
	IP(1)	A map showing injection facilities. ⁵	☐	
	IP(2)	Maximum anticipated surface injection pressure (pump pressure) and daily rate of injection, by well.	☐	
	IP(3)	Monitoring system or method to be utilized to ensure that no damage is occurring and that the injection fluid is confined to the intended zone or zones of injection.	☐	
	IP(4)	Method of injection.	☐	
	IP(5)	List of proposed cathodic protection measures for plant, lines, and wells, if such measures are warranted.	☐	
	IP(6)	Treatment of fluid injected. ⁶	☐	
	IP(7)	Project duration	☐	
	IP(8)	Source and analysis Sources and analyses of the injection fluid to ensure injectate will not affect the quality of water that is, or may reasonably be, used for any beneficial use. ^{7a, 7b}	☐	

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Miscellaneous Requirements	MR(1)	Copies of letters of notification sent to offset operators.	☐	
	MR(2)	All water supply wells that are within the area of review and identified in public records or otherwise known to the operator. ⁸	☐	
	MR(3)	Other data as required for large, unusual, or hazardous projects, for unusual or complex structures, or for critical wells. (Examples of such data are: isochore maps, water-oil ratio maps, isobar maps, equipment diagrams, and safety programs.)	☐	
	MR(4)	All recent fluid levels from idle wells located within the AOR. ⁹	☐	
	MR(5)	A cover page including a statement that a licensed professional, whose signature and stamp appears at the bottom of the page, is responsible for all data, interpretations, and calculations, if any, subject to the requirements of Business and Professions Code sections 6735, 7835, and 7835.1. If the operator determines that the submission does not include data, interpretations, or calculations subject to the requirements of Business and Professions Code sections 6735, 7835, and 7835.1, the cover page must so indicate, and must provide the name(s) and signature(s) of the individual(s) responsible for preparing the submission.	☐	

To help expedite the Water Board's review and to memorialize DOGGR's analysis in a reference document, please identify the location of the data identified below.

- ~~1. Evaluation of the AOR, Project Area, and supporting calculations and assumptions. Statement of the anticipated project duration, anticipated daily rate of injection (by well), and anticipated cumulative net volume of fluid to be injected.~~
- 1a. For ALL project reviews, provide an estimate of the anticipated distance and direction of migration of any Class II fluids to be injected during the remaining life of the project. The application must include a statement and supporting rationale demonstrating that injected Class II fluids have not (for ongoing projects) and will not (for any project) migrate beyond the boundaries of the exempt aquifer or into a USDW. Any evaluation of past, or anticipated future, migration of injected fluids involving geologic or engineering interpretation must be conducted by, or under the direct supervision of, a state-registered professional geologist or professional engineer and signed and stamped by a registered professional ~~as required by~~ to the extent required by California Business and Professions Code sections 6735, 7835, and 7835.1.
- ~~1b. Evaluation of the AOR, Project Area, and supporting calculations and assumptions. Statement of the anticipated project duration, anticipated daily rate of injection (by well), and anticipated cumulative net volume of fluid to be injected.~~
- ~~1b. Immediately notify the operator of any changes to the existing project status or new/modified project review schedule resulting from these findings (potentially including termination of existing project, temporary suspension of the current project review activities, etc.).~~
2. Supporting maps, cross sections, well logs, calculations, and references to find more detailed information. The maps should show the AOR and Project Area, existing exemption boundaries, faults (with displacement information), lines of cross-section, a scale, north arrow and identify the name of formation or unit mapped. Also, structural contour and isopach maps of upper and lower "confining" units. Representative permeability and porosity values, if available, of the "confining" units should be labeled on these maps. The cross sections should also show AOR(s), the proposed injection zone, confining units, the formation or units penetrated by injection with associated API numbers, water supply wells, locations of the base of fresh water (BFW) and USDW, and deviated wells within the line of section (i.e. wells near the cross-section trace).
3. The type log should also include the well's API number, the BFW, all formation names, key e-log markers, labeled geophysical curves and a vertical scale. The type log should also show the base of USDW. The method and data used to determine the base of USDW should be included in the application.
4. Identification of location and depth of all wells and bore holes. Each well and bore hole diagram should depict the entire history (e.g. sidetracks, redrills, and other mechanical changes).
5. The map should show the location of any pretreatment facilities, location of proposed injection wells and any other injection wells plumbed to the facility.
6. Information to include type of treatment and plan for the disposal of reject water.
- ~~7a. Data on water quality of injection zone collected from wells located within the AOR and injectate. The source of the injectate fluids should be identified including zone/formation and approximate volume percentages. Sampling protocol for existing projects (project by project) should be provided. Any proposed water sampling and analysis proposed for new or modified projects should follow the updated Notice to Operators (NTO, 2018). Footnote 8 - Any water quality data that will be used to justify the injection of fluids (e.g., showing that TDS concentrations within the propose injection zone are greater than 10,000 milligrams per liter) must be accompanied by a written statement or report, prepared by a state-registered professional geologist or professional engineer, indicating the degree to which the water quality data is representative of the injectate fluid or native formation waters and providing justification for that conclusion.~~
- 7b. Any water quality data that will be used to justify the injection of fluids (e.g., showing that TDS concentrations within the propose injection zone are greater than 10,000 milligrams per liter) must be accompanied by a written statement or report, prepared by a state-registered professional geologist or professional engineer, indicating the degree to which the water quality data is representative of the injectate fluid or native formation waters and providing justification for that conclusion.

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8. Water well survey. Water supply well locations within the project area should be presented on a map and displayed in a spreadsheet. The water supply well survey should utilize the following data sources (at a minimum): DWR well completion reports and GeoTracker Groundwater Ambient Monitoring and Assessment (GAMA) information system. The following information should be included in the spreadsheet: location information, type (municipal, domestic, irrigation, industrial, stock), status (active, idle, abandoned, destroyed), owner, well completion depth and zone name, top screen, and bottom screen and depths for all screened intervals. On a case-by-case basis, an expanded well survey may be necessary based upon potential risk to beneficial use water outside the limits of the AOR.
9. These data are necessary in order to calculate hydraulic gradients and groundwater flow directions.

Tagab, Clarita@Coastal

From: ExecutiveStaff@Coastal
Sent: Thursday, August 02, 2018 12:15 PM
To: Huckelbridge, Kate@Coastal
Subject: FW: Urgent Request for Ex parte - required info
Attachments: Wetlands slide show .key; Wetlands slide show .ppt

correspondence

From: Anna Christensen <achris259@yahoo.com>
Sent: Wednesday, August 1, 2018 3:39:07 PM
To: Brownsey, Donne@Coastal
Subject: Fw: Urgent Request for Ex parte - required info

re City of Long Beach Local Coastal Program (LCP) Amendment Request No. 1-18 (LCP-5-LOB-18-0026).

Dear Commissioner,

In case you did not receive our first ex parte request, here is the information requested on the Coastal Commission website, I cannot send emails directly so have copied the form.

Project Name and Application Number: City of Long Beach Local Coastal Program (LCP) Amendment Request No. 1-18(LCP-5-LOB-18-0026)

Nature of Communication (In Person, Telephone, Other): A conference call to include tribal members who cannot meet in person

Date and Time Requested: As soon as possible. Item is on the agenda for August 8th (#15z0. We can propose a specific date but would prefer to accommodate the Commissioner's schedule. We can set up a conference call any day after 10 am PST.

Full Name: Anna Christensen/Rebecca Robles

Email: achris259@yahoo.com rebrobles1@gmail.com

On Behalf Of: Protect the Long Beach/Los Cerritos Wetlands, United Coalition to Protect Panhe

Comments:

We appreciate to opportunity to share our concerns with you and also seek your advice and hope to connect with you before the August Coastal Commission meeting. This expansion of oil extraction will endanger public health and safety, the wetlands ecosystem, our coastal beaches and waterways, and a tribal cultural landscape. We hope to meet with you as soon as possible to discuss the Coastal Commission staff report and the upcoming vote to permit new oil drilling sites, expanding oil operations in the Los Cerritos Wetlands.

Dear Commissioner Brownsey,

On July 12th, Protect the Long Beach/Los Cerritos Wetlands contacted you to request an ex parte meeting regarding a request by City of Long Beach for an Amendment to its Local Coastal Program. We have not yet heard back and are concerned that you may not have received our email. This matter will come before the Commission in one week, on August 8th (Agenda Item #15). We have now reviewed the staff report and continue to have concerns which we hope to share with you before the meeting. Please contact us as soon as possible.

Thank you, Rebecca Robles, Acjachemen (949) 573 3138, rebrobles1@gmail.com , Anna Christensen (562) 434 0229, achris259@yahoo.com

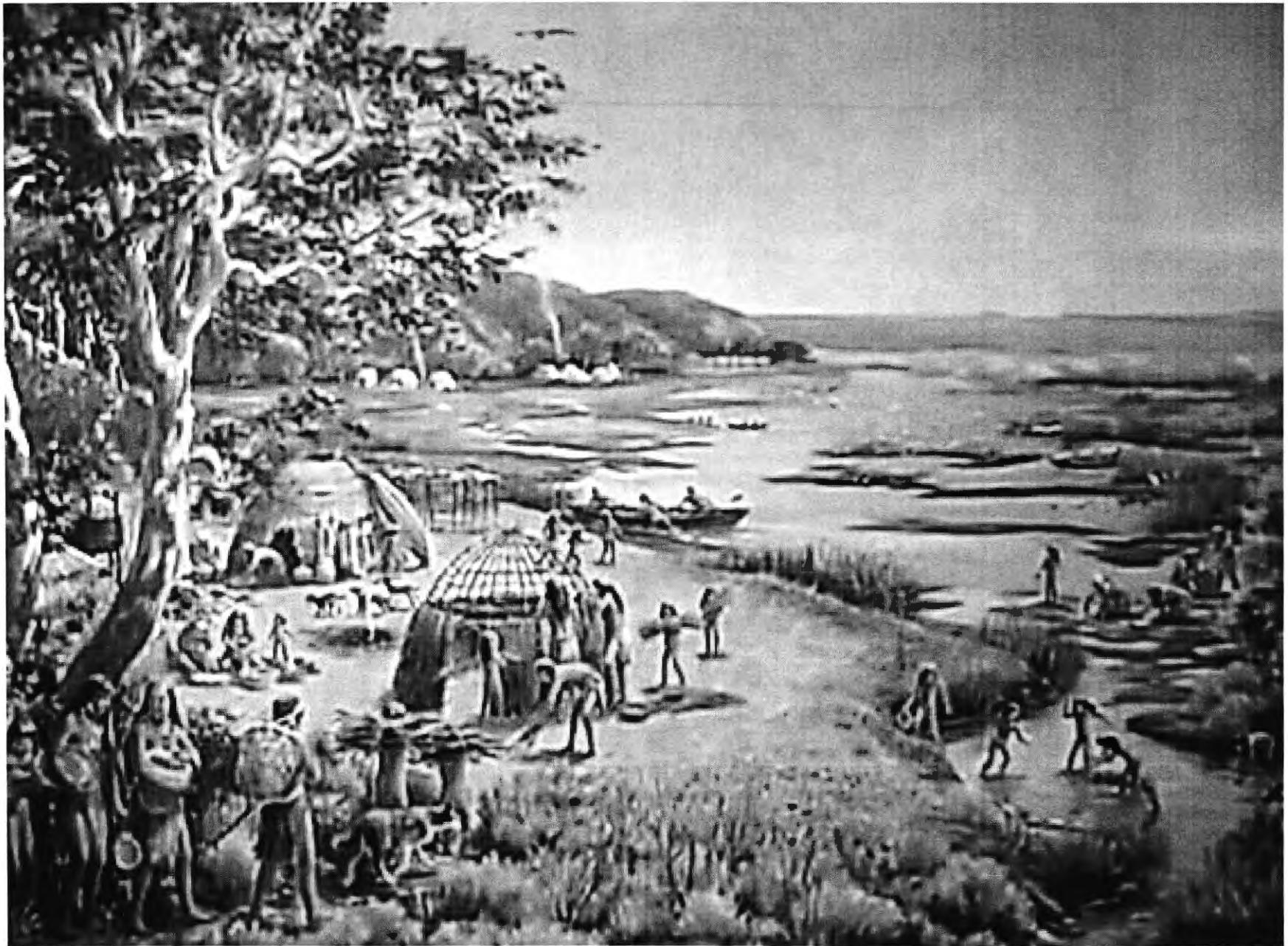
Can the Los Cerritos Wetlands survive The Los Cerritos Wetlands Restoration and Oil Consolidation Project?



a presentation by Protect the Long Beach/Los Cerritos Wetlands



At one time 2400 acres of lagoons, bays, tidal salt marshes and alkali meadows formed the estuary of the San Gabriel



This vast wetlands sustained the Tongva coastal communities of Puvungna and Motuucheyngna

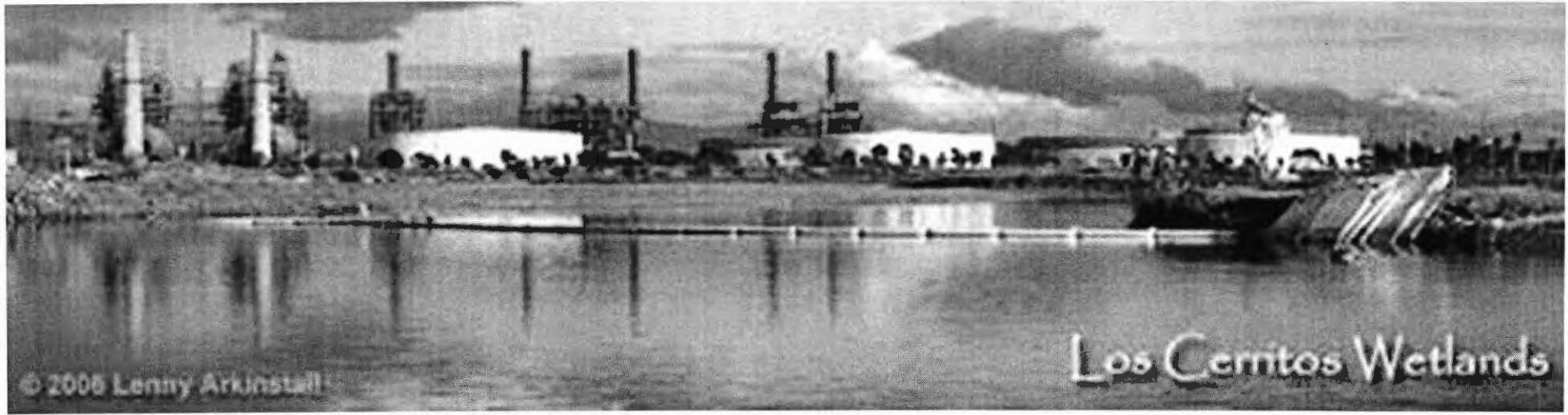
The Los Cerritos Wetlands are sacred to the Tongva and Acjachemen who follow the teachings of Chinigchinich, lawgiver and god, originating from Puvungna. They will continue to oppose the removal of their ancestors and the disappearance of their history that will result from this oil drilling project.



“Respect should be given those indigenous nations who still carry on their ceremonies, still following the ancient laws of nature” Lillian Robles, Acjachemen Elder



This 1921 photo, taken before the San Gabriel River was channelized, shows the river crossing a unified Bolsa Chica and Los Cerritos Wetlands and entering the Pacific Ocean through



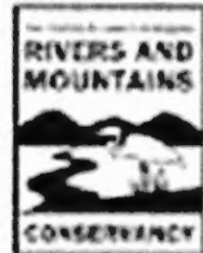
Today the Los Cerritos Wetlands have been reduced to 500 acres of open space managed by the Los Cerritos Wetlands Authority. While the area has been degraded by industrial use, it still has both fresh and salt water marshes and wetlands habitat supporting local wildlife

LOS CERRITOS WETLANDS

Los Cerritos Wetlands Authority

In February of 2006, a joint powers agreement was adopted among the:

Rivers & Mountains Conservancy, State Coastal Conservancy,
& Cities of Long Beach & Seal Beach


Los Cerritos Wetlands Authority



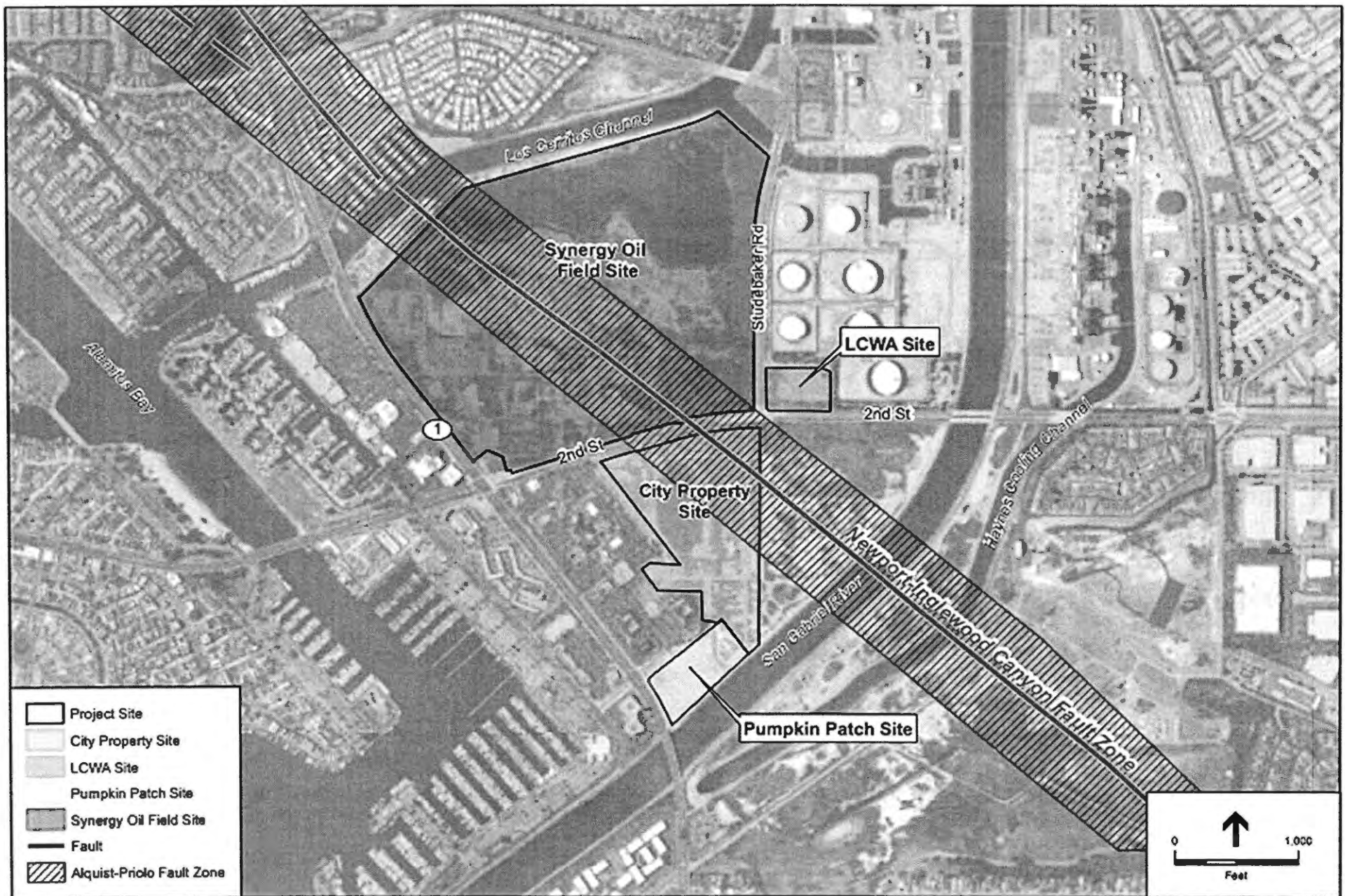

Coastal Conservancy

These agencies comprise the project's Steering Committee

So what exactly is The Los Cerritos Wetlands Restoration and Oil Consolidation Project?



Each Oils Minerals Partners and the Los Cerritos Wetlands Authority say that their oil drilling project will restore the degraded Los Cerritos Wetlands by relocating oil operations and removing old drilling rigs, pipes, and storage tanks.



The Project area consists of four sites within, or adjacent to, the Los Cerritos Wetlands which are bisected by the Newport-Inglewood Fault



Pretty Pictures and Promises sell oil extraction as Wetlands Restoration

"Mother Nature needs our help, and yours. At the core of the Project is a passionate commitment to the environment. This rare opportunity makes what's previously been impossible—possible: to restore the wetlands with proper planning and a commitment to restoration funding" BOMP

Remove all existing oil wells and equipment from Synergy and City sites within 40 years

Establish mitigation bank to fund partial restoration of Synergy property

Restore and revegetate Synergy property as oil wells and oil production facilities are removed

Establish visitors center, parking, bike and walking trails on wetlands

Transfer ownership of the Synergy property to LCWA in exchange for lot at 2nd & Studebaker

What are they actually going to do and what are the risks?



California Coastal Commission staff has stated that calling this project “wetlands restoration” and “oil consolidation” is “misleading” to the public; further commenting that “the *expansion* of oil extraction and processing operations at the Synergy Oil Field” is the actual goal.”

“Restoration” projects are often the “feel good” means by which developers win permission to do other environmental



business, but not for the environment. And it is big business: \$70 billion for wetlands restoration projects in North America in the past 20 years. “Restoration” of the Los Cerritos Wetlands, including high berms, bulldozing, construction, and herbicides to kill “invasive” species, will destroy existing homes and food sources of wildlife. Plans for a visitor’s center, parking lot, bike and walking trails will offer “public access” but enlarge the human footprint at the expense of the environment.



Developers continue to ignore California Indians, “mitigating” the destruction of sacred sites by removing and storing “artifacts” for research by archaeologists. Public agencies maintain close relationships with developers while failing to consult with all affected tribal groups as required by law, resulting in a pattern of environmental racism.

Expansion?

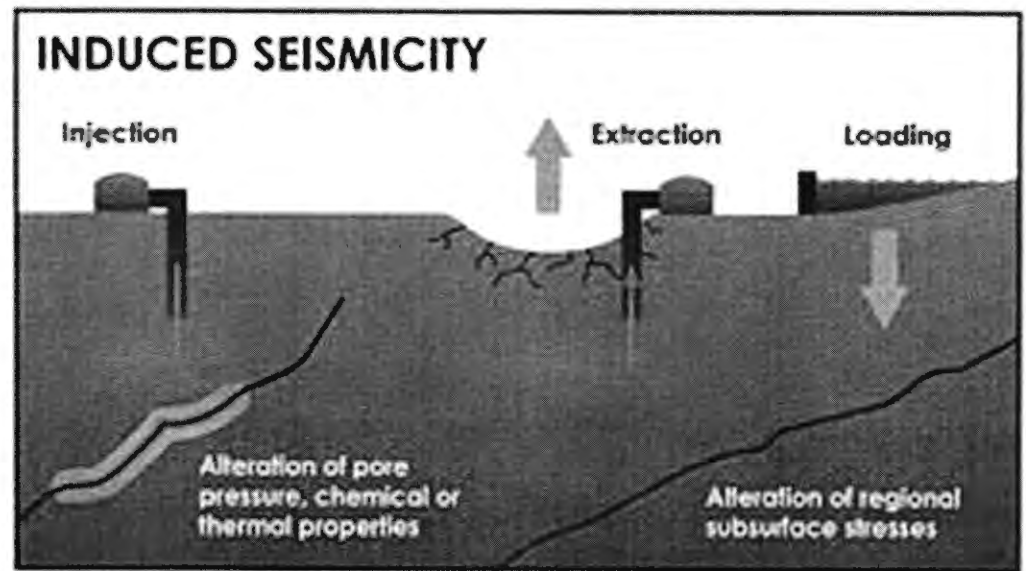
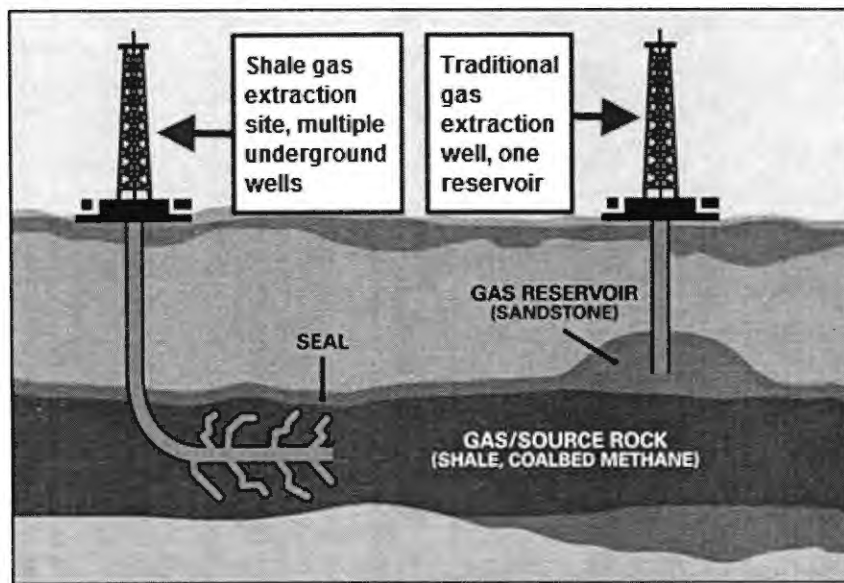


Beach Oil Minerals Partners retains the mineral rights to the Pumpkin Patch,

LCWA, City of Long Beach, and Synergy sites and plans to construct:
a 2,200 ft. pipeline crossing the earthquake fault on the city-owned wetlands,
a 160 ft. high drilling rig, a 120 ft. high workover rig, three well cellars with 50
new oil, water injection and water source wells, water treatment and oil
separation systems, a 3,000-barrel oil tank, a 2,000-barrel “skim oil” tank, a
warehouse and office building on the Pumpkin Patch site,
three well cellars for 70 new oil and water source wells, a 120 ft. high
workover rig, a 25 ft. high ground flare for methane gas, an elevated pipe
rack, an energy system microgrid, a 28,000 barrel oil tank, a 5,000-barrel
injection water tank, and two 14,000-barrel multi-use tanks on the LCWA
site.

Modern? yes - Safe? NO

The shale oil and gas boom has brought the oil industry roaring back to life. In the Los Angeles basin companies are now extracting oil using “enhanced” drilling techniques such as acidizing, hydraulic fracturing, and “directional drilling,” going down vertically thousands of feet below the surface and then horizontally for miles.



- So what is Beach Oil Minerals Partners “modern” drilling proposal?
- New “directional” drilling extending under the wetlands and surrounding local areas
 - “Enhanced” drilling methods using the same toxic chemicals as fracking
 - Billions of gallons of water injected under pressure to remove & replace oil
 - Wasting and polluting water in California during the worst drought in 1200 years
 - Extraction of 200 million barrels of oil. increasing global warming & sea rise



Not if, but when. Oil spills and earthquakes will happen, losses cannot be prevented. The fossil fuel industry continues to exploit vulnerable communities, leaving a trail of environmental disaster in its wake. We are considered disposable, just another tax write off!

WHAT ARE THE RISKS OF THIS PROJECT TO NEIGHBORING COMMUNITIES?



Beach, earthquakes on the fault line triggered by drilling operations
Island Village, Leisure World, and other neighborhoods could be
Accidents and pipeline leaks, that release oil and toxins could be
facing
Contamination of wetlands, waterways and ocean beaches
Poor health, lower property values, loss of revenue from tourism

“The process is geared to getting to yes. We look at what’s being proposed by the applicant, and we do our best to make the applicant’s project feasible.”

Do we accept the status quo and wait for help when disaster strikes?



Or act now to protect ourselves, our homes and our



Beach's Local Coastal Program to allow oil drilling on the Pumpkin Patch and LCWA sites and NO to The Los Cerritos Wetlands Restoration and Oil Consolidation Project

Contact Coastal Commission staff, attend the August meeting in Redondo Beach and future Coastal Commission meetings where the project is on the agenda.

#2

Contact your Long Beach or Seal Beach City Council member, your state and federal representatives, and the local news media. Oil tax dollars are not worth the risk of losing our wetlands and our quality of life.

#3

Educate yourself and others about the shale oil boom and the true cost of fossil fuel extraction, global warming, and sea rise.

#4

Join and support organizations fighting this project and working to stop the fossil fuel industry from destroying our communities.



Protect the Long Beach/Los Cerritos Wetlands is a coalition of tribal, environmental, and social justice organizations and concerned citizens saying NO to the Los Cerritos Wetlands Restoration and Oil Consolidation Project

Our goal is to stop the extraction of 200 million barrels of oil from beneath the Los Cerritos Wetlands and neighboring communities, putting them at risk.

Follow us on Facebook at *Protect the Long Beach/Los Cerritos Wetlands*

August 2, 2018

TO: Commissioners and Interested Persons

From: Renee Lawler, 3005 San Francisco Ave, Long Beach CA 90806

SUBJECT: City of Long Beach Local Coastal Program (LCP) Amendment Request No. 1-18 (LCP-5-LOB-18-0026). For public hearing and Commission action at the Commission's August 8, 2018 meeting in Redondo Beach.

The Commission is being asked to vote on four Motions and Resolutions. I urge you to not certify the modifications that would allow oil and gas development on two sites within the SEADIP area.

According to *Mallon v City of LB – 4/13/56* Tidelands statutes Chapter 29 Section 10 (b)...no present or future contract....for oil....shall be modified or amended in any respect without the advance consent of the State Lands Commission....(c) Every future contract, future royalty arrangement, or other future agreement, & every modification or amendment of any present or future contract...made in violation of this section shall be void.

Please reference the SUMMARY OF LCP AMENDMENT REQUEST NO. 1-18 submitted by Alison Dettmer, Deputy Director, Kate Huckelbridge, Senior Environmental Scientist dated 7/26/18 (see below the portion of that report) Section 12 & 13 of which I am referring - the action(s) **may not be legally permissible**, according to prior Tidelands case law.

*13. Oil and gas development shall be permitted in accordance with Section 12, if the following conditions are met: a. The development is performed safely and consistent with the geologic conditions of the well site. b. New or expanded facilities related to that development are consolidated, to the maximum extent feasible **and legally permissible**, unless consolidation will have adverse environmental consequences and will not significantly reduce the number of producing wells, support facilities, or sites required to produce the reservoir economically and with minimal environmental impacts.*

Please vote no on LCP amendment request to the certified Land Use Plan (LUP) and Implementation Plan (IP) policies in the Southeast Area Development and Improvement Plan (SEADIP) and the City's Oil Code, both components of the City of Long's Beach's LCP. Amendment Request No. 118 would add Oil Production Uses as an allowable use on two sites located within the SEADIP area, the Pumpkin Patch site (part of Subarea 25) and the Los Cerritos Wetlands Authority (LCWA) site (Subarea 19). The LCP amendment would also revise the City's Oil Code to reflect the addition of these two areas as "Oil Operating Areas." The City Council submitted the LCP amendment request for Commission certification with City Council Resolution No. RES-18-0010. The proposed changes to the LCP are set forth in City Ordinances No. ORD-18-0001 and No. ORD-18-002.

At present, until the proposed amendments are fully reviewed by the State Lands Commission, they may not be legally permissible, subject to being void, without the prior approval from the State Lands Commission.

I am opposed to these amendments and/or drilling new wells, as there is likelihood of negative impacts due to the geologic condition, sensitive ESHA, historic coastal wetlands areas which should be protected by and subject to public trust doctrine.

Tagab, Clarita@Coastal

From: Elaine Layne <flutetootsie2u2@verizon.net>
Sent: Thursday, August 02, 2018 11:42 AM
To: Coastal Los Cerritos Wetlands
Subject: Los Cerritos Wetlands

August 2, 2018

I fully support the staff recommendation to deny the amendment request as submitted and support staff recommendations to certify the land use plan with requested modifications.

This LCP amendment will allow for the wetlands restoration, which I favor.

Thank you,

Elaine Layne

Seal Beach, California
Audubon Member

Sent from AOL Mobile Mail

Tagab, Clarita@Coastal

From: jill brennan <jillbrennan2014@gmail.com>
Sent: Thursday, August 02, 2018 11:41 AM
To: Energy@Coastal; jill brennan
Subject: Wednesday 8/8/18 Agenda Item 15a-City of LOnG Beach LCP Amendment 1-18

As a member of Audubon and a wetlands and wildlife advocate, I oppose this amendment and urge you to vote NO.

I attended the BOMP slick presentations last fall and was appalled at the duplicity in their presentations.

Common sense: Who trades 154 acres of wetlands(that number seems to change) for 5 acres? 160 new oil wells on 5 acres? Follow the money!

Their clean up and mitigation plans span 40 years so who will be around when they fail to comply with their promises and environmental restrictions?

This land is in an earthquake and subsidence zone. One moderate earthquake and the wetlands will be oil contaminated.

Will Leisure World Seal Beach sink as they extract oil from their 160 wells on 5 acres?

Drought and water shortages: Where will they get water for fracking?

Sea level rise is a very real concern and some models have this area under water by 2030.

So many serious questions unanswered.

Please vote NO and save our wetlands.

Concerned Seal Beach resident,

Jill Brennan

Tagab, Clarita@Coastal

From: Isabelle Teraoka <isabelle.teraoka@wuhsd.org>
Sent: Thursday, August 02, 2018 8:37 AM
To: Coastal Los Cerritos Wetlands
Subject: In support of the Local Coastal Program Amendment

Dear members of the Coastal Commission,

As a local resident, I have had the opportunity to visit part of the Los Cerritos Wetlands and I understand its value both for wildlife and people. I just want to register my support for the Wetlands Mitigation Bank Project in partnership with BOM.

Thank you for your work and consideration,

Isabelle Teraoka
(562)274-2212

Tagab, Clarita@Coastal

From: Camille Thompson <thompdog3@gmail.com>
Sent: Thursday, August 02, 2018 6:14 AM
To: Coastal Los Cerritos Wetlands
Subject: public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach
LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

I support Staff's recommendation to deny the amendment request as submitted, and support Staff's recommendations to certify the land use plan with the requested modifications. This LCP Amendment will allow for wetlands restoration, something many people have desired for a very long time.

Thank you very much for your consideration and approving the LCP amendment as stated above

Sincerely
Camille Thompson
13301 El Dorado Dr.
204E
Seal Beach CA 90740

Tagab, Clarita@Coastal

From: Lorraine Zavala <lmzava@gmail.com>
Sent: Thursday, August 02, 2018 5:05 AM
To: EORC@coastal.ca.gov; Coastal Los Cerritos Wetlands
Subject: City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

Kate Huckelbridge

California Coastal Commission

45 Fremont, Suite 2000

San Francisco, CA 94105-2219

Re: City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

Dear California Coastal Commission,

I am writing to you to express my full support of the Gabrieleno Band of Mission Indians - Kizh Nation in their objectives to protect, preserve, and restore the saltwater wetlands which was part of their sacred Kizh village of Puvungna.

The land today is part of the City of Long Beach and is known as Los Cerritos Wetlands. This sacred area for the Kizh needs to be protected and preserved, however, what is essential for its future preservation is its restoration.

This includes the removal of all oil production wells from these saltwater wetlands to eliminate any future chance of leakage or damage to the soil, or contamination of the air, or poisoning of the plants and wildlife still living in these wetlands.

I support the Kizh Nation's joint efforts with the Los Cerritos Wetlands Trust and the Beach Oil Mineral Partners to clean up and restore these wetlands to help regain its previous ecological functions. If left alone, in its current state, the land will simply continue to degrade leading to the permanent elimination of the last remaining plants and animals living in these wetlands. Restoration is a necessary reality for this wetland and it takes work - something the Kizh Nation is capable and willing to do. Protection and Preservation of sacred areas does not include neglect and leaving them as is, which will ultimately lead to its loss.

I thank you for taking the time to take my opinion into account.

Sincerely,

Lorraine M. Zavala

Kate Huckelbridge
California Coastal Commission
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

Re: City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

Dear California Coastal Commission,

August 1, 2018

I am writing to you to express my full support of the Gabrieleno Band of Mission Indians – Kizh Nation in their objectives to protect, preserve, and restore the saltwater wetlands which was part of their sacred Kizh village of Puvungna. The land today is part of the City of Long Beach and is known as Los Cerritos Wetlands. This sacred area for the Kizh needs to be protected and preserved, however, what is essential for its future preservation is its restoration. This includes the removal of all oil production wells from these saltwater wetlands to eliminate any future chance of leakage or damage to the soil, or contamination of the air, or poisoning of the plants and wildlife still living in these wetlands. I support the Kizh Nation's joint efforts with the Los Cerritos Wetlands Trust and the Beach Oil Mineral Partners to clean up and restore these wetlands to help regain its previous ecological functions. If left alone, in its current state, the land will simply continue to degrade leading to the permanent elimination of the last remaining plants and animals living in these wetlands. Restoration is a necessary reality for this wetland and it takes work – something the Kizh Nation is capable and wanting to do. Protection and Preservation of sacred areas does not include neglect and leaving them as is, which will ultimately lead to its loss. I thank you for taking the time to take my opinion into account.

Principle of Connectivity: All of our care and stewardship upstream (INVESTMENT) in the San Gabriel River Watershed mean ZERO unless downstream projects and stewardship such as Los Cerritos Wetlands are high priority too!

Sincerely,

Ann Croissant, Ph.D.

President/Board of Directors

San Gabriel Mountains Regional Conservancy (SGMRC)

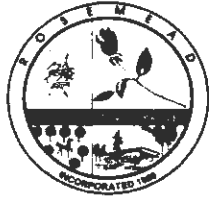
P.O. Box 963, Glendora, CA 91740

www.sgmrc.org

MAYOR:
STEVEN LY

MAYOR PRO TEM:
MARGARET CLARK

COUNCIL MEMBERS:
SANDRA ARMENTA
POLLY LOW



City of Rosemead

8838 E VALLEY BOULEVARD P.O. BOX 399
ROSEMEAD, CALIFORNIA 91770
TELEPHONE (626) 569-2100
FAX (626) 307-9218

August 1, 2018

Kate Huckelbridge
California Coastal Commission
Energy, Ocean Resources and Federal Consistency Division
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

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Sincerely,

Margaret Clark

Margaret Clark
Mayor Pro Tem
City of Rosemead

August 1, 2018

Dr. Kate Huckelbridge
California Coastal Commission
Energy, Ocean Resources, and Federal Consistency Division
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Re: Los Cerritos Wetlands Oil Consolidation and Restoration Project – Letter of Support

Dear Dr. Huckelbridge,

I am writing in support of the Los Cerritos Wetlands Oil Consolidation and Restoration Project (project). Our community has been provided with the rare opportunity to restore 154 acres of coastal wetlands, a valuable habitat type and increasingly rare refuge for threatened and endangered species. This project is a win for the City of Long Beach, the Coastal Commission, the surrounding community, the landowners, and the wetlands. Beyond the environmental and educational benefits of implementing a large-scale wetland restoration project, the site will become a focal point and landmark within Long Beach, similar to the notoriety of the restored Bolsa Chica Ecological Reserve.

As a certified Professional Wetland Scientist, I owe my career to restoration efforts of the Los Cerritos Wetlands. I was afforded the opportunity to participate in a research project on the Los Cerritos Wetlands as an undergraduate student at California State University, Long Beach, in which I helped develop a conceptual restoration plan for entire Los Cerritos Wetlands complex. That research project dovetailed into my first position as a consulting wetland scientist and has subsequently become my full-time career. Restoring the Los Cerritos Wetlands will provide opportunities for K-12, undergraduate, and graduate students to become interested in wetland science at an early age, conduct meaningful research in a rare coastal wetland, and use the site as a springboard to shape careers as scientists and environmental stewards for generations to come. Including a network of trails within the site will ensure extensive public use and encourage citizens to further value our coastal resources.

Consolidation of the on-site oil operations provides the maximum benefit in terms of the restoration potential of Los Cerritos Wetlands. Opponents of the project focus on the proposition to drill additional oil wells and prolong the lifespan of oil operations within the wetland complex, though this perspective does not view the project within the complex reality of implementing restoration projects on privately owned and economically valuable land. Oil production is not an ideal use of open space in terms of aesthetics or environmental impact, but it is a variable that we are required to work around on this site and is ultimately what allows the restoration project to move forward. Reducing oil operations to 95% of its current footprint will considerably reduce unappealing oil infrastructure, provide an aesthetically pleasing landscape upon entry into Long Beach, provide a safer oil production operation, and reduce habitat fragmentation by eliminating 88,000 linear feet of above-ground pipeline. Ultimately, oil operations on the site will cease production, though it is important to compromise in the short-term.

Tidally influenced wetlands are increasingly rare, and the opportunity to restore such a large area is even more uncommon. In my experience as a wetland scientist, the most difficult part of restoring a wetland is to create a predictable and sustained wetland hydrological regime. The Los Cerritos Wetlands have an existing connection to a tidally influenced body of water, providing the optimal starting point for returning this area to its original state. The large-scale nature of this project provides an additional

benefit, as the overwhelming majority of restoration projects occur on small, disconnected parcels of land. Piecemeal restoration and mitigation works on a small scale and satisfies regulatory requirements, but it does not contribute to the big picture in a meaningful way. Mitigation banks provide an effective means of funding and executing large-scale habitat restoration projects, while simultaneously providing invaluable benefits to the surrounding community in perpetuity.

The Los Cerritos Wetlands Oil Consolidation and Restoration Project has the potential to create, restore, and enhance one of the last remaining large-scale coastal wetland complexes in southern California. I support this project and look forward to seeing the Los Cerritos Wetlands become a proud focal point and scenic gateway into Long Beach.

Thank you,

A handwritten signature in black ink, appearing to read 'D. Cardoza', with a stylized, flowing script.

Daniel Cardoza
Professional Wetland Scientist

August 1, 2018

Ms. Kate Huckelbridge
California Coastal Commission
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

Re: City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

Dear California Coastal Commission,

I am writing to you to express my full support of the Gabrieleno Band of Mission Indians – Kizh Nation in their objectives to protect, preserve, and restore the saltwater wetlands which was part of their sacred Kizh village of Puvungna. The land today is part of the City of Long Beach and is known as Los Cerritos Wetlands. This sacred area for the Kizh needs to be protected and preserved, however, what is essential for its future preservation is its restoration. This includes the removal of all oil production wells from these saltwater wetlands to eliminate any future chance of leakage or damage to the soil, or contamination of the air, or poisoning of the plants and wildlife still living in these wetlands. I support the Kizh Nation's joint efforts with the Los Cerritos Wetlands Trust and the Beach Oil Mineral Partners to clean up and restore these wetlands to help regain its previous ecological functions. If left alone, in its current state, the land will simply continue to degrade leading to the permanent elimination of the last remaining plants and animals living in these wetlands. Restoration is a necessary reality for this wetland and it takes work – something the Kizh Nation is capable and wanting to do. Protection and Preservation of sacred areas does not include neglect and leaving them as is, which will ultimately lead to its loss. I thank you for taking the time to take my opinion into account.

Sincerely,

Victoria Jones

Juaneno Band of Mission Indians

Vickygoodwin1@hotmail.com

**CHRIS and MICHAEL DONELON
6245 E GOLDEN SANDS DRIVE
LONG BEACH, CALIFORNIA
90803**

California Coastal Commission

Re: Los Cerritos Wetlands Oil Consolidation and Restoration Project

To Whom It May Concern:

As a resident of Belmont Shore Mobile Estates I want to lend my support to the restoration and relocation project. I spend many hours enjoying the wildlife along the wetlands. Our neighborhood is the best kept secret in Long Beach and the only one along the perimeter of the wetlands site.

As a former Long Beach Council Member I am very familiar with the history and struggles in the area. This is a great opportunity to restore our wetlands for future generations to enjoy.

Sincerely,
Hon. Michael Donelon
mikedonelon@aol.com

Kate Huckelbridge
California Coastal Commission
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

Re: City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

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Sincerely, Bobby Villarreal

Tagab, Clarita@Coastal

From: jmaraf77 <jrafter057@gmail.com>
Sent: Wednesday, August 01, 2018 9:26 PM
To: Energy@Coastal
Subject: Los Cerritos Wetlands

Kate Huckelbridge

California Coastal Commission

45 Fremont, Suite 2000

San Francisco, CA 94105-2219

Re: City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

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August 1, 2018

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Sincerely,

John Michael Rafter
Professor at Mt. San Antonio College
4638 Pine Street
Pico Rivera, CA 90660
jrafter057@gmail.com

Tagab, Clarita@Coastal

From: Coastal Los Cerritos Wetlands
Sent: Wednesday, August 01, 2018 4:36 PM
To: Huckelbridge, Kate@Coastal
Cc: Hudson, Steve@Coastal
Subject: FW: Restoring Los Cerritos Wetlands

Senia Beckford

From: john b [<mailto:bchowsee@yahoo.com>]
Sent: Wednesday, August 01, 2018 3:51 PM
To: Coastal Los Cerritos Wetlands
Subject: Restoring Los Cerritos Wetlands

Dear California Coastal Commission.

Please clean up all the contamination at the Los Cerritos Wetlands and perform restoration at this Native American's sacred land as soon as possible. This action will allow nature to return back to its original pre-European native natural state.

Sincerely,

John Browning
12506 Rose Drive
Whittier, CA., 90601

Sent from Yahoo Mail for iPhone

Tagab, Clarita@Coastal

From: +15623312273@tmomail.net
Sent: Wednesday, August 01, 2018 3:50 PM
To: Energy@Coastal
Attachments: text_0.txt

Dear California Coastal Commission. Please clean up all the contamination at the Los Cerritos Wetlands and perform restoration at this Native American's sacred land as soon as possible. This action will allow nature to return back to its original pre-European native natural state. Sincerely,
John Browning 12506 Rose Drive Whittier, CA., 90601

T-Mobile

This message was sent to you by a T-Mobile wireless device.

Tagab, Clarita@Coastal

From: Coastal Los Cerritos Wetlands
Sent: Wednesday, August 01, 2018 2:55 PM
To: Huckelbridge, Kate@Coastal
Cc: Hudson, Steve@Coastal
Subject: FW: Los Cerritos Wetlands Oil Consolidation and Restoration Project
Attachments: Megan Wolff Support Letter.docx

Sonia Beckford

From: Megan Wolff [<mailto:mroy564@gmail.com>]
Sent: Wednesday, August 01, 2018 2:31 PM
To: Coastal Los Cerritos Wetlands
Subject: Los Cerritos Wetlands Oil Consolidation and Restoration Project

Good afternoon,

It is my pleasure to provide my letter of support to help make this critical project to restore the most pristine wetlands in Long Beach, California possible. This habitat restoration plan is groundbreaking and hope that my letter helps move the project forward.

Best,

Megan Wolff

August 8, 2018

Kate Huckelbridge
California Coastal Commission
45 Fremont Street, Suite 2000,
San Francisco, CA 94105- 2219

RE: Los Cerritos Wetlands Oil Consolidation and Restoration Project

Kate Huckelbridge,

I am writing to express my support for the Los Cerritos Wetlands Oil Consolidation and Restoration Project. I have long been involved with restoration of the Los Cerritos Wetlands and this project accomplishes a significant step towards restoring the entire San Gabriel River estuary. I was first exposed to this conservation effort as a student at Long Beach City College as a volunteer and intern for the LCWA's Stewardship Program. This exposure helped me understand the value of our rare coastal natural areas and defined a clear path for my studies and future career.

After receiving my bachelors in Ecology, Evolution, and Marine Biology at UC Santa Barbara, I put my degree to work and started working for Tidal Influence on restoration projects and community-based programs. I now work for Palos Verdes Peninsula Land Conservancy as the Volunteer Coordinator and have grown a respect for how challenging these types of large-scale conservation efforts are. Especially when it comes to acquired private landholdings. This project proposes to convey a significant portion of the Los Cerritos Wetlands from private to public ownership, and in doing so will allow for more public access and educational opportunities so that our future environmental scientists can access the same experience I was fortunate to have.

Steamshovel Slough is the gem of Los Cerritos Wetlands and its enhancement will be a remarkable success! Furthermore, the endowment provided by the project will keep the wetlands highly functioning in perpetuity.

The greatest achievement of the project will be the immediate removal of the existing storage tanks and pipelines throughout 100 acres of land. This will represent a substantial visual improvement in the area and allow for the tidal wetlands to be free of constraints and exposure to future oil spills. This is a unique opportunity to restore degraded habitat that cannot be missed, and I hope that this project is approved.

Regards,

A handwritten signature in cursive script that reads "Megan Wolff".

Megan Wolff

From: Mary Parsell <mfp2001@hotmail.com>
Sent: Wednesday, August 01, 2018 2:10 PM
To: Energy@Coastal
Cc: Mary Parsell
Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

El Dorado Audubon Society

PO 90713 Box, Long Beach, CA 90809

Mission: Conservation of Native Birds and their Habitats and Education

August 1, 2018

California Coastal Commission

August 8, 2018 Agenda Item 15a, City of Long Beach LCP Amendment No. 1018
(LCP-5-LOB-18-0026-1) SEADIP

Dear Commissioners:

We support the Staff's recommendations to certify the land use plan with the requested modifications.

As a coastal chapter, El Dorado Audubon Society members live in Long Beach, Seal Beach and cities inland along the Los Angeles and San Gabriel Rivers. Hundreds of years ago these rivers emptied into large tidal marshes along the coast providing a rich variety of birds and other wildlife—today tidal marshes are the rarest remnant of Southern California's original habitats.

We support the implementation of the Los Cerritos Wetlands Conceptual Restoration Plan created by the Los Cerritos Wetlands Authority (LCWA). (See note 1). We have participated in the process on this project as it moved through the City of Long Beach, Draft EIR and Final EIR. The project the city approved in January 2018 included our requested modifications to the basic project. (See note 2)

El Dorado Audubon and our membership are excited at the prospect of seeing this large, degraded oil-field site restored to a fully functioning coastal wetland; it is an Audubon California Important Bird Area. (See note 3)

Sincerely,
Mary Parsell, President

1. Los Cerritos Wetlands Authority (LCWA) – Cities of Seal Beach, Long Beach, California Coastal Conservancy and Lower Los Angeles & San Gabriel Rivers and Mountains Conservancy (RMC)

2. El Dorado Audubon's requested modifications included in City approval of project,

such as establishment of an interpretive center, wildlife-protecting limitations on public access, use of current bird-safe building practices, and elimination of exotic plant species from project landscaping, that Audubon considers important elements of an important project of this magnitude

3. Audubon California IBA, Orange Coast Wetlands, Daniel S. Cooper, 2002

Tagab, Clarita@Coastal

From: Mireya Parravicini <quben@aol.com>
Sent: Wednesday, August 01, 2018 11:20 AM
To: Energy@Coastal
Subject: Los Cerritos Wetlands

My name is Mireya Parravicini and I live in Monterey Park. I am in full support of the Gabrieleno Band of Mission Indians-Kizh nation in their effort to restore the saltwater wetlands known as Los Cerritos Wetlands, today part of the city of Long Beach. This area was part of their sacred village of Puvungna, and needs to be restored in order to be preserved. At the very least, oil production wells need to be removed and steps undertaken to prevent future damage. The most pressing need of our present world is open spaces for the natural environment to flourish and the respectful treatment of historical heritage. If this area is neglected, it will ultimately be lost to all.

Thank you for allowing me to express my opinion.

Yours,

Mireya Parravicini

Huckelbridge, Kate@Coastal

From: Elizabeth Lambe <ejlambe@gmail.com>
Sent: Wednesday, August 01, 2018 11:04 AM
To: Huckelbridge, Kate@Coastal; Coastal Los Cerritos Wetlands
Cc: Terry Welsh; Michael Di Sano
Subject: Requesting Approval of City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)
Attachments: Letterhead - Los Cerritos.pdf

Re: Beach Oil Minerals/ Los Cerritos Wetlands Oil Consolidation and Restoration Project

Dear Dr. Huckelbridge and Honorable Commissioners:

I am submitting, at the request of the Banning Ranch Conservancy, their letter of support for the Los Cerritos Wetlands Oil Consolidation and Restoration Project proposed by Beach Oil Minerals (BOM).

Sincerely,

Elizabeth Lambe
Executive Director
Los Cerritos Wetlands Land Trust
<http://lcwlandtrust.org/>



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In Memoriam

1/16/18

To Craig Chalfant:

Dear Craig,

The Banning Ranch Conservancy is a 401c(3) non-profit corporation which is focused on the 400-acre Banning Ranch oil field in west Newport Beach. We are a grass-roots, community-based environmental group. Our mission is to "Preserve, Acquire, Conserve, and Manage the entire Banning Ranch as a permanent Public Open Space, Park and Coastal Nature Preserve."

The Banning Ranch Conservancy supports the Los Cerritos Wetlands Oil Consolidation and Restoration Project.

Thank you,

Terry Welsh, M.D.

President, Banning Ranch Conservancy

P.O.Box 16071
Newport Beach, CA
92659-6071

(310) 961-7610

Huckelbridge, Kate@Coastal

From: Taylor Parker <parkertaylor83@gmail.com>
Sent: Wednesday, August 01, 2018 8:22 AM
To: Coastal Los Cerritos Wetlands
Subject: Support for the Los Cerritos Wetlands Oil Consolidation and Restoration
Attachments: LCW_SupportLetter_Parker_1Aug18.pdf

Dr. Huckelbridge,

It is my honor to offer support for the Los Cerritos Wetlands Oil Consolidation and Restoration Project. For 11 years I was fortunate enough to be involved in the conservation of the Colorado Lagoon and the Los Cerritos Wetlands. These are remarkable projects that provide inspiration for other coastal communities trying to navigate the challenges of urban growth and environmental sustainability. This current project is a terrific opportunity for the state of California to exhibit the innovative leadership that has propelled these restorations into the national and global spotlight for successful conservation.

Attached is my letter of support. I love talking about the wetlands so please do not hesitate to contact me for future support of these special places.

Thank you,

Taylor Parker

August 1, 2018

Kate Huckelbridge, PhD
California Coastal Commission
45 Fremont Street
Suite 2000
San Francisco, CA 94105

RE: Support of Los Cerritos Wetlands Oil Consolidation and Restoration Project

Dr. Huckelbridge,

The Los Cerritos Wetlands are very special for the cities of Long Beach and Seal Beach and the coast of California, in general. After helping lead this local conservation effort for over a decade, I am elated to hear that the restoration of this important habitat is being considered by the California Coastal Commission. I humbly express my support for the Los Cerritos Wetlands Oil Consolidation and Restoration Project. As a former owner and co-founder of Tidal Influence, LLC, I have long supported restoration of the Los Cerritos Wetlands and this project accomplishes the admirable goal of transferring a significant portion of the wetlands from private to public ownership while enhancing public access and education opportunities. Further, the project provides a much-needed endowment to the LCWA for the maintenance of the wetlands in perpetuity.

As a native Californian, coastal advocate, and former Long Beach conservationist, I can confidently say that this project is a definitive win for the people of California. Ensuring the protection of the remnant ecological resources is an investment in California's coastal future. The focus on wetland habitat for ecosystem services, environmental education, recreational access, and natural preservation provides a healthy and sustainable foundation on which to ensure local coastal resiliency.

Additionally, the proposed project is a safer alternative for everyone involved. Oil operations in the wetlands have no containment currently and pose a significant threat in the event of a spill or rupture; removing the wells and oil facilities removes that risk. The immediate removal of the existing storage tanks and pipelines will also be a substantial visual improvement in the area.

This is a unique opportunity to exhibit vision and leadership to restore degraded habitat and increase access. It is my hope that this project is approved.

Sincerely,



Taylor Andrew Parker
Graduate Student, Conservation Social Science
Clemson University, South Carolina

Tagab, Clarita@Coastal

From: Timothy miguel <timmiguel@sbcglobal.net>
Sent: Wednesday, August 01, 2018 8:20 AM
To: Coastal Los Cerritos Wetlands
Subject: Restoring the wetlands at Cerritos

Kate Huckelbridge
California Coastal Commission
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

Re: City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEAD1P)

Dear California Coastal Commission,

August 1, 2018

I am writing to you to express my full support of the Gabrieleno Band of Mission Indians – Kizh Nation in their objectives to protect, preserve, and restore the saltwater wetlands which was part of their sacred Kizh village of Puvungna. The land today is part of the City of Long Beach and is known as Los Cerritos Wetlands. This sacred area for the Kizh needs to be protected and preserved, however, what is essential for its future preservation is its restoration. This includes the removal of all oil production wells from these saltwater wetlands to eliminate any future chance of leakage or damage to the soil, or contamination of the air, or poisoning of the plants and wildlife still living in these wetlands. I support the Kizh Nation's joint efforts with the Los Cerritos Wetlands Trust and the Beach Oil Mineral Partners to clean up and restore these wetlands to help regain its previous ecological functions. If left alone, in its current state, the land will simply continue to degrade leading to the permanent elimination of the last remaining plants and animals living in these wetlands. Restoration is a necessary reality for this wetland and it takes work – something the Kizh Nation is capable and wanting to do. Protection and Preservation of sacred areas does not include neglect and leaving them as is, which will ultimately lead to its loss. I thank you for taking the time to take my opinion into account.

Sincerely,

Tim Poyorena-Miguel

THE rancho

LOS ALAMITOS | a place for all time

July 31, 2018

Kate Huckelbridge
Senior Environmental Scientist
California Coastal Commission
Energy, Ocean Resources & Federal Consistency Division
45 Fremont Street, Suite 2000
San Francisco, California 94105

Dear Ms. Huckelbridge:

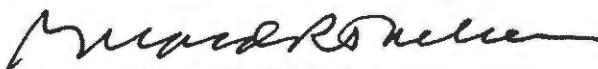
This letter is written in response to the thoughtful and comprehensive plan developed by Beach Oil Minerals Partners and local agencies and stakeholders aimed at restoring and preserving the Los Cerritos Wetlands for the enjoyment of generations to come. By downsizing, relocating and modernizing current oil operations, the Los Cerritos Wetlands Oil Consolidation and Restoration Project is an exciting opportunity to accomplish what has been discussed for decades, which is the ultimate restoration and preservation of the almost 150 acres of biologically sensitive coastal wetlands back to its natural state.

As you know, the Bixby Family first began oil operations within the boundaries of the Los Cerritos Wetlands nearly 100 years ago and, up until about a decade ago, Bixby oil operations continued to extract oil from the land for commercial purposes. Since the property changed hands around 2007, there have been several reports of attempts to achieve restoration of the wetlands but not until the Beach Oil Minerals Partners presented the approach currently under review has there been a concrete "public-private" partnership which appears capable of achieving both the goals of wetlands restoration and preservation, along with retention of viable oil operations, which form the necessary financial basis to accomplish the overall plan.

Of additional relevance, Rancho Los Alamitos Foundation has had preliminary discussions with principals of Beach Oil Minerals Partners with hopes the Rancho Los Alamitos Historic Ranch and Gardens might be in a position to help in the presentation of the human history of the Los Cerritos Wetlands using exhibits designed by the Rancho's professional curatorial staff and placed within the proposed on-site Visitors Center. We believe this would be an excellent way to better educate visitors about the historical and cultural contributions this land has made to Long Beach and to Southern California at large.

The Los Cerritos Wetlands Oil Consolidation and Restoration Project is an exciting, even historic, opportunity to achieve the restoration and preservation of the Los Cerritos Wetlands and the Board of Directors, staff and volunteers of Rancho Los Alamitos heartily support this plan.

Sincerely,



Gerald R. Miller, Chairman
Rancho Los Alamitos Foundation

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Martene Temple
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EXECUTIVE DIRECTOR EMERITUS
PAMELA SEACER

6400 E. Bixby Hill Road
Long Beach, CA 90815
562.431.3541 T
562.430.9694 F

Tagab, Clarita@Coastal

From: Ed Zwieback <ed.zwieback@gmail.com>
Sent: Tuesday, July 31, 2018 9:42 PM
To: Coastal Los Cerritos Wetlands; Energy@Coastal
Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach
LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

ATTN: Kate Hucklebridge

I support the Los Cerritos Wetlands Oil Consolidation and Restoration Project and hope the Commissioners approve the LCP Amendment as staff has recommended with modifications. This is a once in a lifetime opportunity that we can't miss out on to own a restored wetlands.

City Staff has done a great job over several years to educate the public and we want the project as proposed!

Lets Restore the Wetlands!

Sincerely,
Ed Zwieback
Long Beach, CA

Tagab, Clarita@Coastal

From: Camille Thompson <thompdog3@gmail.com>
Sent: Tuesday, July 31, 2018 6:42 PM
To: Coastal Los Cerritos Wetlands; +EORFC@coastal.ca.gov
Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach
LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

ATTN: Kate Hucklebridge

I support the Los Cerritos Wetlands Oil Consolidation and Restoration Project and hope the Commissioners approve the LCP Amendment as staff has recommended with modifications. This is a once in a lifetime opportunity that we can't miss out on to own a restored wetlands.

City Staff has done a great job over several years to educate the public and we want the project as proposed!

Lets Restore the Wetlands!

This will be a project that all can be proud of for decades in the future.
Join us in creating a long lasting legacy for the community members and their families.

Camille Thompson
13301 El Dorado Dr. # 204E
Seal Beach CA 90740

Tagab, Clarita@Coastal

From: Brigitte Bigham <brigitte.bighamcbca@gmail.com>
Sent: Tuesday, July 31, 2018 5:47 PM
To: Coastal Los Cerritos Wetlands; Energy@Coastal
Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach
LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

ATTN: Kate Hucklebridge

I support the Los Cerritos Wetlands Oil Consolidation and Restoration Project and hope the Commissioners approve the LCP Amendment as staff has recommended with modifications. This is a once in a lifetime opportunity that we can't miss out on to own a restored wetlands.

City Staff has done a great job over several years to educate the public and we want the project as proposed!

Lets Restore the Wetlands!

Sent from my iPhone

Tagab, Clarita@Coastal

From: Cindy Crawford <cec1174@aol.com>
Sent: Tuesday, July 31, 2018 5:07 PM
To: Energy@Coastal; Coastal Los Cerritos Wetlands
Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

Agenda Item 15a, City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

I support Staff's recommendation to deny the amendment request as submitted, and support Staff's recommendations to certify the land use plan with the requested modifications.

For over 50 years I have lived just north of the proposed project. I strongly feel left as is, the current oil operations pose an environmental hazard. These are old "grandfathered" oil extraction methods. I've been out on my kayak during king tides and witnessed the high tide line come right to the top of the berm separating the near pristine Los Cerritos Wetlands marsh from the Synergy Oil Field. Should sea level rise much higher these old oil wells are in danger of flood, posing a hazard to both the wetlands and Alamitos Bay. Something must be done.

The new proposed locations, it is my understanding would be out of the sea level rise zone. The only question is how fast can we essentially "move" wells to the better location with more modern technology including leak detection? Mr. McKeown has publicly expressed desire to move old wells out as soon as ten years if at all possible. I fully support that goal.

This LCP Amendment will allow for wetlands restoration, something a large number of Long Beach residents have desired for a very long time. Many people in nearby neighborhoods have expressed concerns of fire hazards of the current operations and the desire to beautify the area now known as Synergy Oil Fields. The project will meet both of those desires.

Although some very loud newcomers to this project are protesting this amendment, and the restoration of Los Cerritos Wetlands unless all oil operations cease to exist, this is not a feasible goal now or anytime in the near future. The ecological value of wetlands can't be stated enough and to leave as is and wait 50 years or more for "the end of oil" is simply not environmentally responsible.

Therefore I urge you to of course fully review the facts, the staff recommendations, and let's restore a wetlands, sooner rather than later.

Thank you very much for your consideration.

Sincerely,
Cindy Crawford

Huckelbridge, Kate@Coastal

From: Anne Blemker <ablemker@mccabeandcompany.net>
Sent: Tuesday, July 31, 2018 11:48 AM
To: Huckelbridge, Kate@Coastal
Cc: Michael Di Sano; Posner, Chuck@Coastal; Susan McCabe
Subject: Briefing Materials for Item W15a
Attachments: BOMP Briefing Book 7.31.18.pdf

Hi Kate,

Attached please find a copy of briefing materials that we'll be sharing with Commissioners. Please confirm receipt.

Thanks,
Anne

Anne Blemker
McCabe & Company
10520 Oakbend Drive
San Diego, CA 92131
310.463.9888



Item W15a

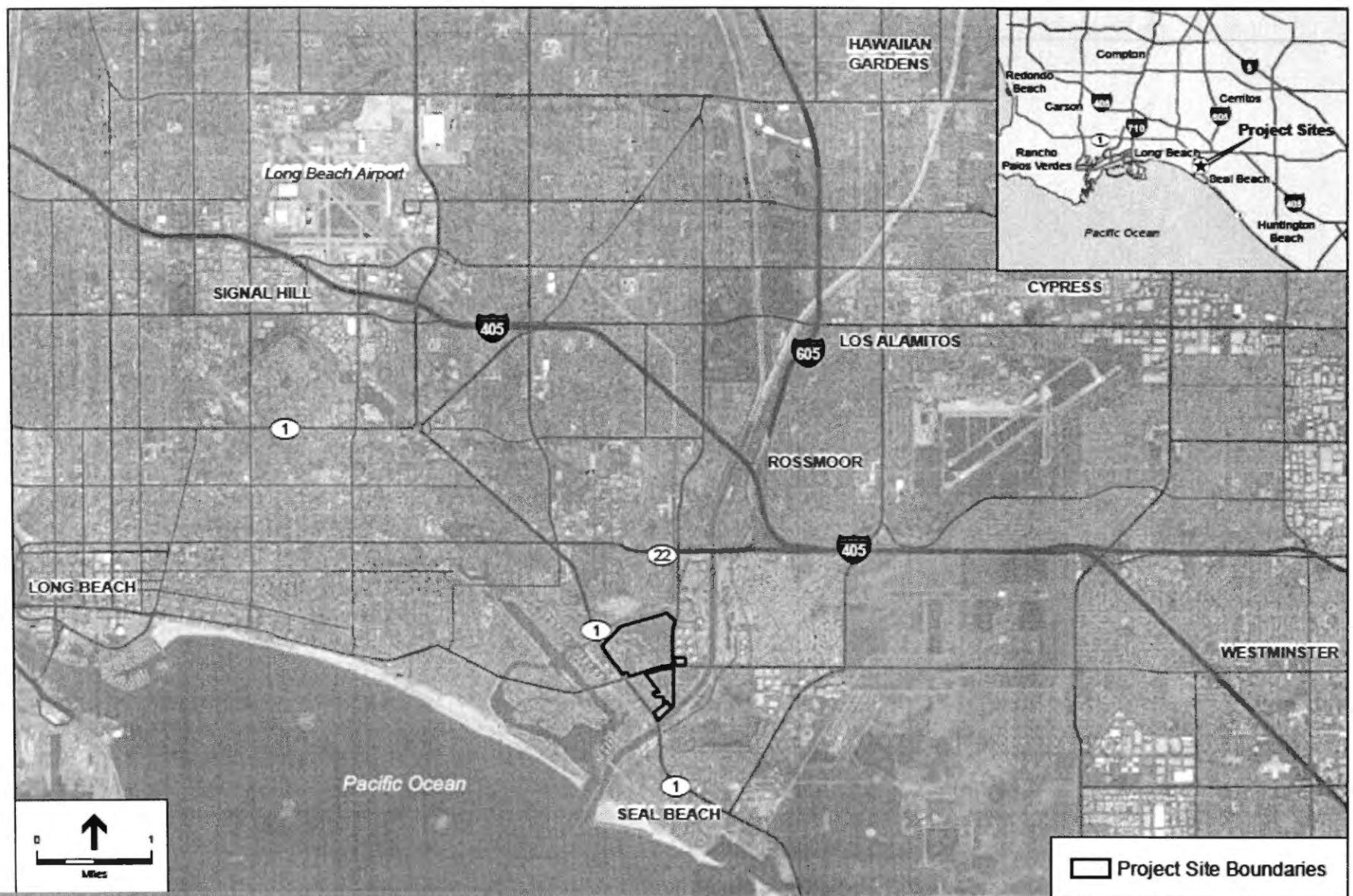


LCP-5-LOB-18-0026-1 (City of Long Beach)

CDP No. 9-18-0395

July 2018

A copy of these briefing materials has been provided to CCC staff.



Project Vicinity

Long Beach Cerritos Wetland . 150712

Figure 2-1
Regional Location



Project Overview

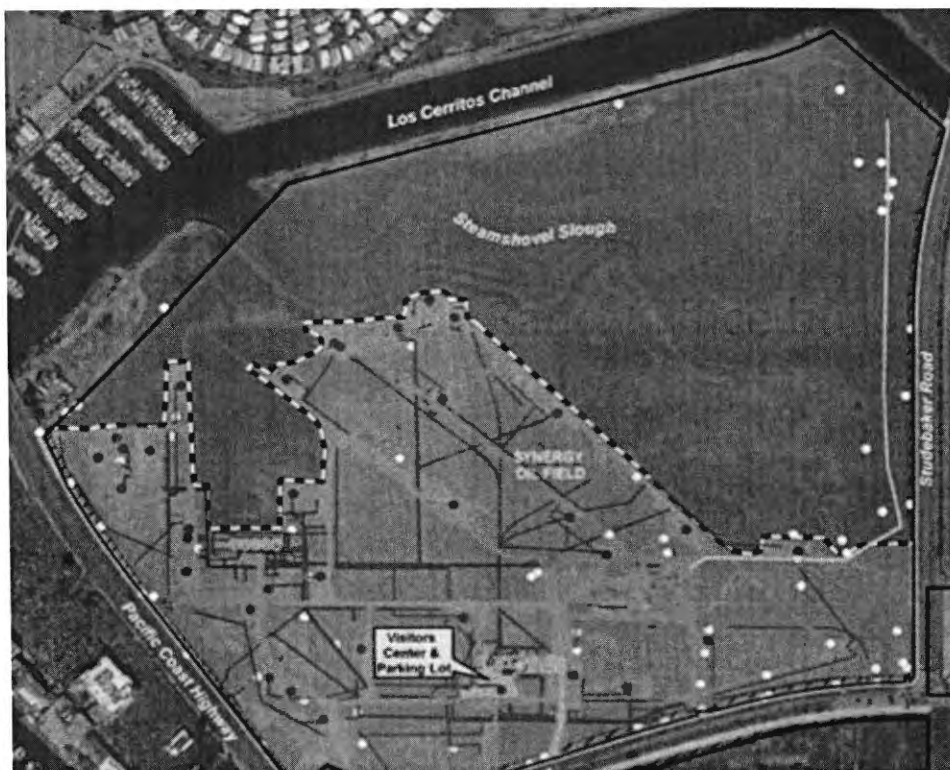
Project Description

LCP-5-LOB-18-0026-1 (City of Long Beach)

City of Long Beach Local Coastal Plan amendment to amend the SEADIP Specific Plan (Southeast Area Development and Improvement Plan, PD-1) to allow oil production uses in SEADIP Subareas 19 and 25, the locations of an oil well consolidation project proposed by Beach Oil Minerals Partners (BOMP).

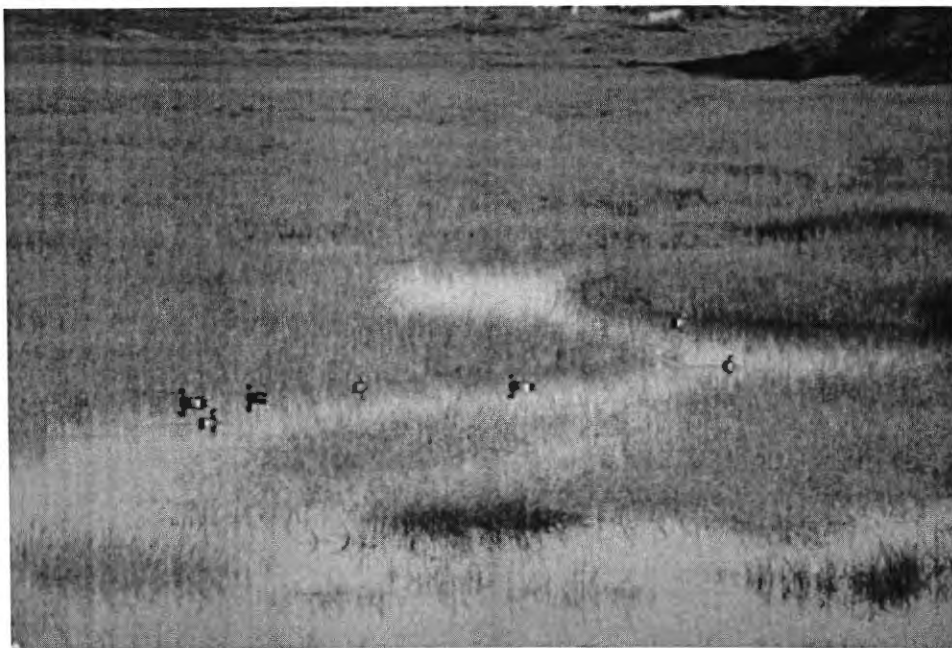
CDP Application No. 9-18-0395 (Los Cerritos Wetlands Oil Consolidation and Restoration Project)

Consolidated Coastal Development Permit to allow expansion and relocation of oil extraction and processing operations from existing oil field within the City of Long Beach to two nearby sites, the Pumpkin Patch site and the Los Cerritos Wetlands Authority (LCWA) site. In addition, Beach Oil Mineral Partners (BOMP) proposes to implement a comprehensive wetlands restoration project at the existing oil field through the creation of a wetland mitigation bank.



Synergy Site Existing Conditions

- Bixby Ranch Office building
- 53 oil wells
- 3 tank farms
- ~ 17 miles pipeline
- Los Cerritos Wetlands
- Newport-Inglewood EQ fault



Synergy Site Proposed



- Remove 95% existing pipelines & tank farms
- Rehabilitate Historic Bixby Ranch Building into Visitors Center
- Transfer Ownership to Los Cerritos Wetlands Authority ("public hands")
- Establish Non-wasting Endowment to maintain the restored wetlands in perpetuity
- Create public access trail, sidewalks & bikeways

Pumpkin Patch Site Existing Conditions



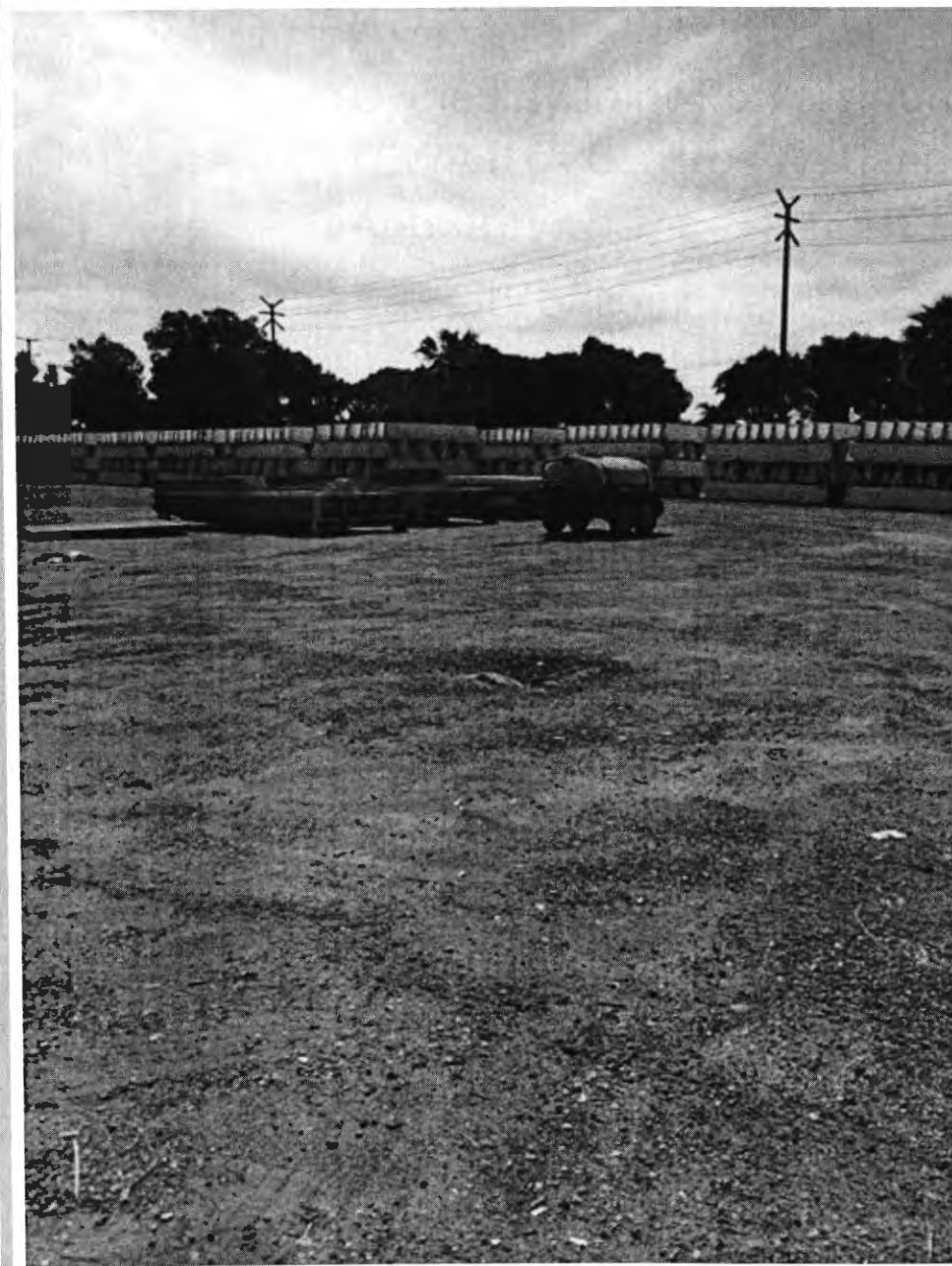
- Previously disturbed site contains no archaeological or paleontological resources
- Currently used for seasonal Pumpkin and Christmas Tree Sales

Pumpkin Patch Site Proposed



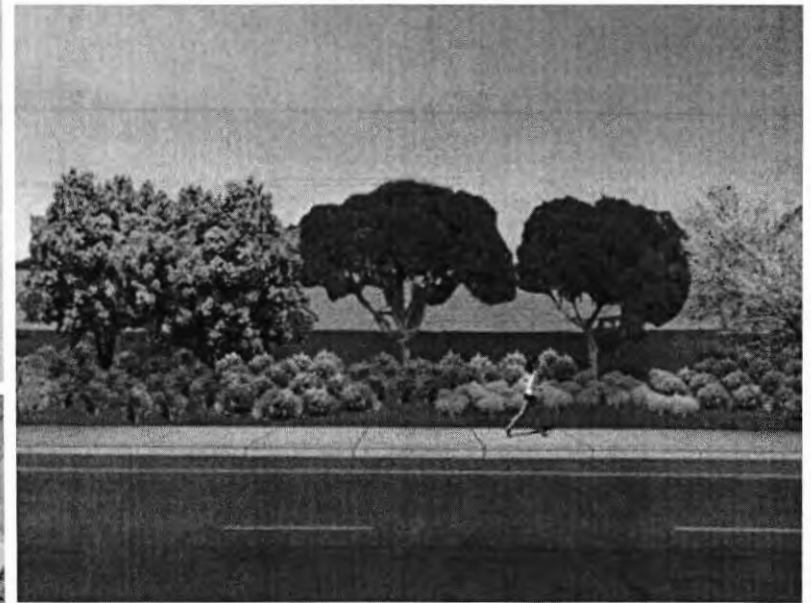
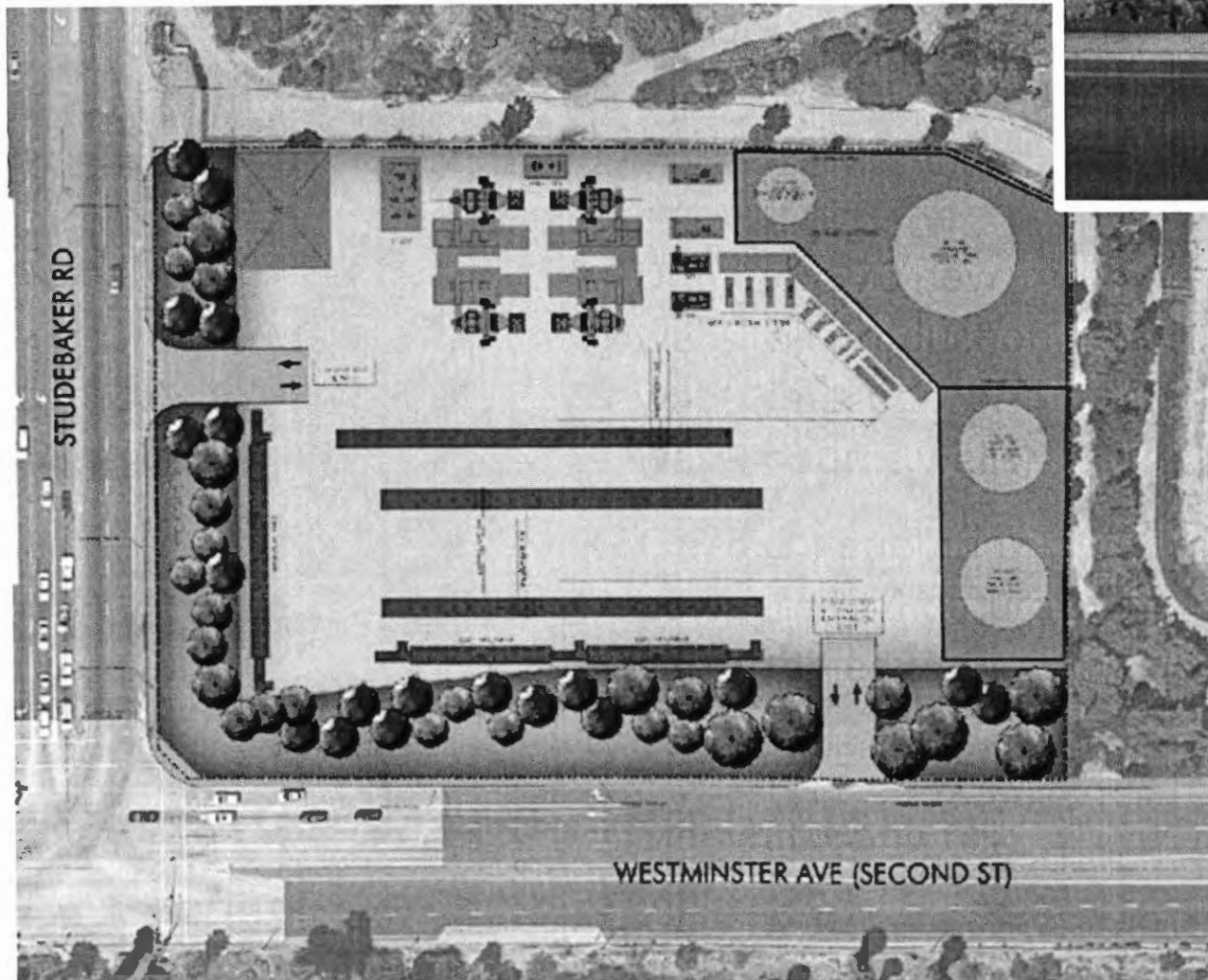
- Drill up to 50 new wells (combination of approx. 50% oil production, & 50% water injection, & water source wells)
- Two-Story Office Building and Warehouse with rooftop solar
- Electric vehicle charging stations
- Vegetative Screening & City of Long Beach entry monument
- Sidewalks and Bike Lanes & bike fixit station

LCWA Site Existing Conditions



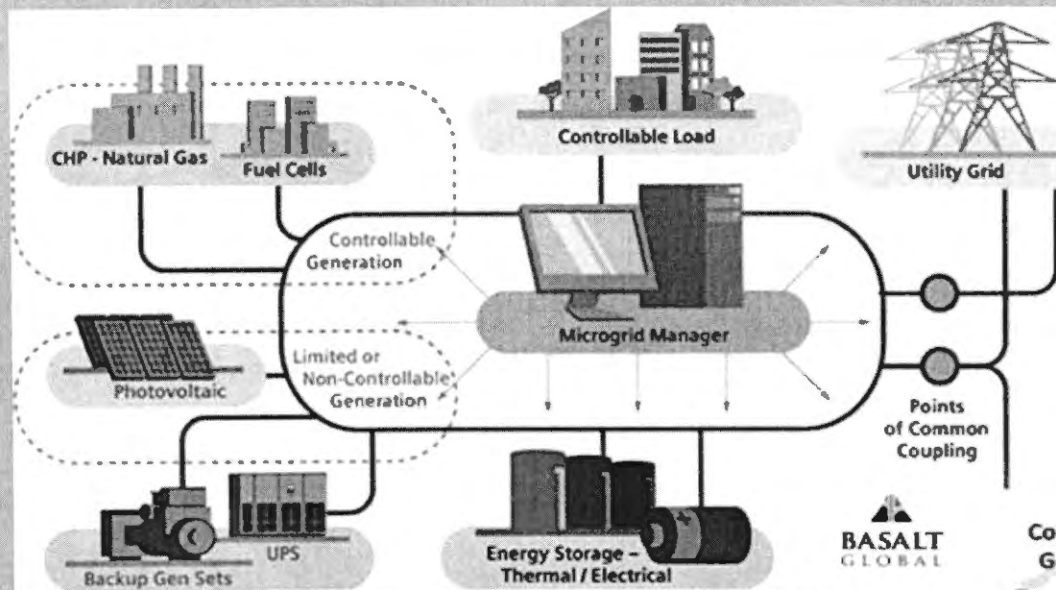
- Owned by Joint-Powers Authority – LCWA (Los Cerritos Wetlands Authority)
 - City of Long Beach
 - City of Seal Beach
 - Rivers and Mountains Conservancy
 - CA Coastal Conservancy
- Zoned Industrial
- Used for construction equipment storage
- No habitat or sensitive biological resources
- Previously disturbed site contains no archaeological, paleontological resources or biological resources

LCWA Site Proposed

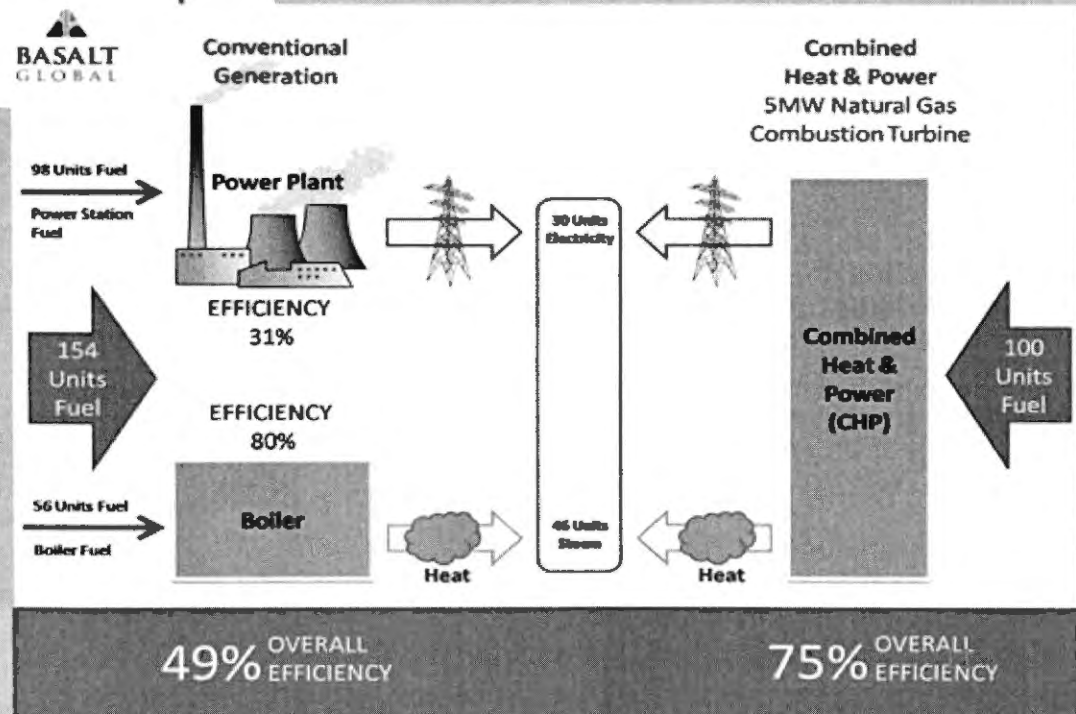


- Drill up to 70 new wells (oil production, water injection, and water source wells)
- Clean cogeneration of power with 4 natural gas turbines
- Vegetative screening
- Sidewalks and bike lanes

Benefits of Microgrid Energy System



- Turbine cogeneration reduces air pollution/greenhouse gases over 50% cleaner instead of using SCE power and distributing the natural gas into the grid
- Uses zero pollution solar panels
- Increases safety during blackouts & reduces potential for emergency flaring
- Allows electric vehicle charging



Project to Produce Low Carbon Oil

- The Low Carbon Fuel Standard Regulation provides a carbon index for all oil refined in California
 - CA Air Resources Board “Carbon Intensity” analysis of oil refined in California (gCO₂e/MJ)
 - Placerita oil field (North LA County) = 31.20
 - Canadian Oil Sands (Premium Albian Synthetic oil field) = 21.39
 - California average, all refined oil = 11.98
 - THUMS Islands (Wilmington oil field) = 7.02
 - Long Beach oil field = 6.84
 - Project oil field (Seal Beach) = 5.08
 - Long Beach Airport oil field = 4.02
 - The Project could have the lowest index if the project is implemented
 - Vetted by academic community, legal decisions, years of public input

Project will significantly improve existing wetlands system by:

- **Breaching existing berm in multiple locations to restore historic tidal influence**
- **Restoration enables the doubling of healthy wetlands**
- **Establish non-wasting endowment for wetlands maintenance in perpetuity**



Coastal Act Consistency

MARINE RESOURCES

- Marine resources to be “*maintained, enhanced and where feasible, restored.*”
- Project restores wetlands and removes oil infrastructure, including pipelines and tanks, and
 - Creates 78-acre wetlands mitigation bank on northern portion of Synergy site to restore tidal exchange from Los Cerritos Wetlands (Steamshovel Slough);
 - Limits impacts to wetlands for allowable use, including installation of sheet pile wall to contain re-established tidal flows; and
 - Includes planting of wetland vegetation per mitigation bank restoration plan.

Coastal Act Consistency

HABITAT/LAND RESOURCES

- Project results in no loss of existing habitat; instead increases/improves wetland habitats both in terms of areal extent and function;
- Trail to be signed to inform public of sensitive habitats within Phase 1 Mitigation Bank area and to prohibit off trail access;
- Trail to be separated from wetland areas to west by 100 feet of native upland buffer;
- No impact to wetland vegetation is expected to occur from tank/pipeline removal activities; however:
 - If impacts to wetland vegetation occur, Applicant to restore impacted area by removing any material not present prior and reseeding any area where vegetation has been significantly affected.

Coastal Act Consistency

ARCHAEOLOGICAL RESOURCES

- Previously developed portions of site do not contain archaeological or paleontological resources that would be adversely impacted.
- Potential discovery of archaeological or paleontological resources has been considered and mitigation has been provided in Project EIR.
 - Mitigation includes:
Native American Monitor during all grading activities

Coastal Act Consistency

PUBLIC ACCESS AND RECREATION

- Project incorporates rehabilitation of existing historic office structure for use as a visitors center.
- New parking lot will be constructed in association with visitors center.
- Trail to be constructed starting at visitors center parking lot and running parallel to Studebaker Road on eastern perimeter edge of restored wetlands area.
- Sidewalks and bikeways on all property frontages

Coastal Act Consistency

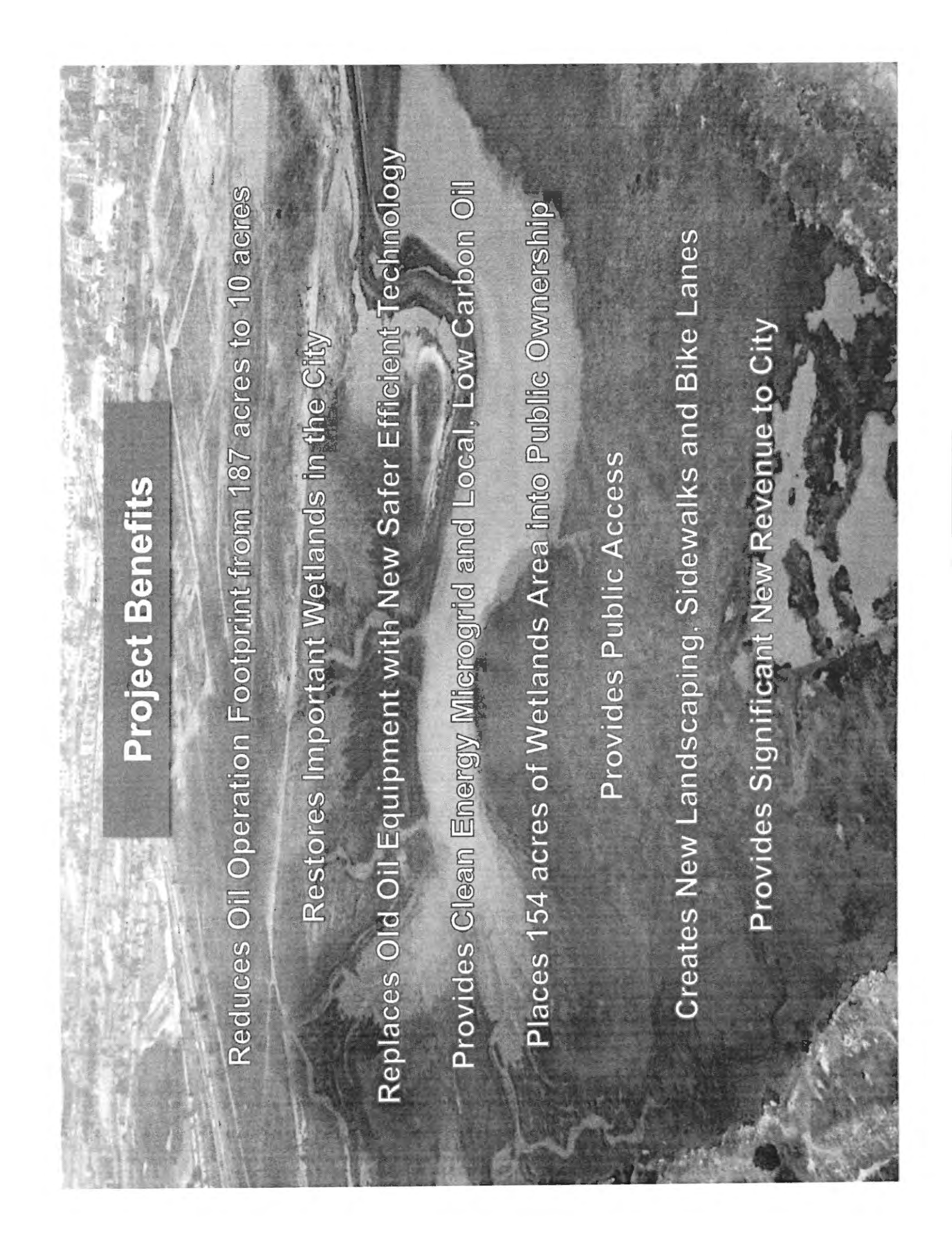
SCENIC RESOURCES

- Project sites are located within developed industrial and commercial areas, are either undeveloped or contain existing oil operations, and are not currently considered areas of significant scenic resource.
- Lighting impacts will be minimized by limiting lighting, which will be regulated by a Lighting Plan approved by the City.
- City requires fencing be erected around new drilling operations and drill sites and that offsite improvements be provided including curbs, gutters, sidewalks and bike paths.

Coastal Act Consistency

HAZARDS AND INDUSTRIAL DEVELOPMENT

- Project poses no unacceptable or unusual risks from fire, flood, or geotechnical hazards.
- Project contained within existing boundaries of Synergy and City sites/no oil production expansion to adjacent sites.
- Oil produced at Project site to be transported to off-site refineries using two existing oil shipping pipelines in immediate vicinity of Project site, minimizing potential for spillage due to tanker/truck transport.
- Natural gas to be transported via active gas pipeline owned and operated by Southern California Gas Company.
- Effective containment measures have been included to minimize impact should accidental spills occur.



Project Benefits

Reduces Oil Operation Footprint from 187 acres to 10 acres

Restores Important Wetlands in the City

Replaces Old Oil Equipment with New Safer Efficient Technology

Provides Clean Energy Microgrid and Local, Low Carbon Oil

Places 154 acres of Wetlands Area into Public Ownership

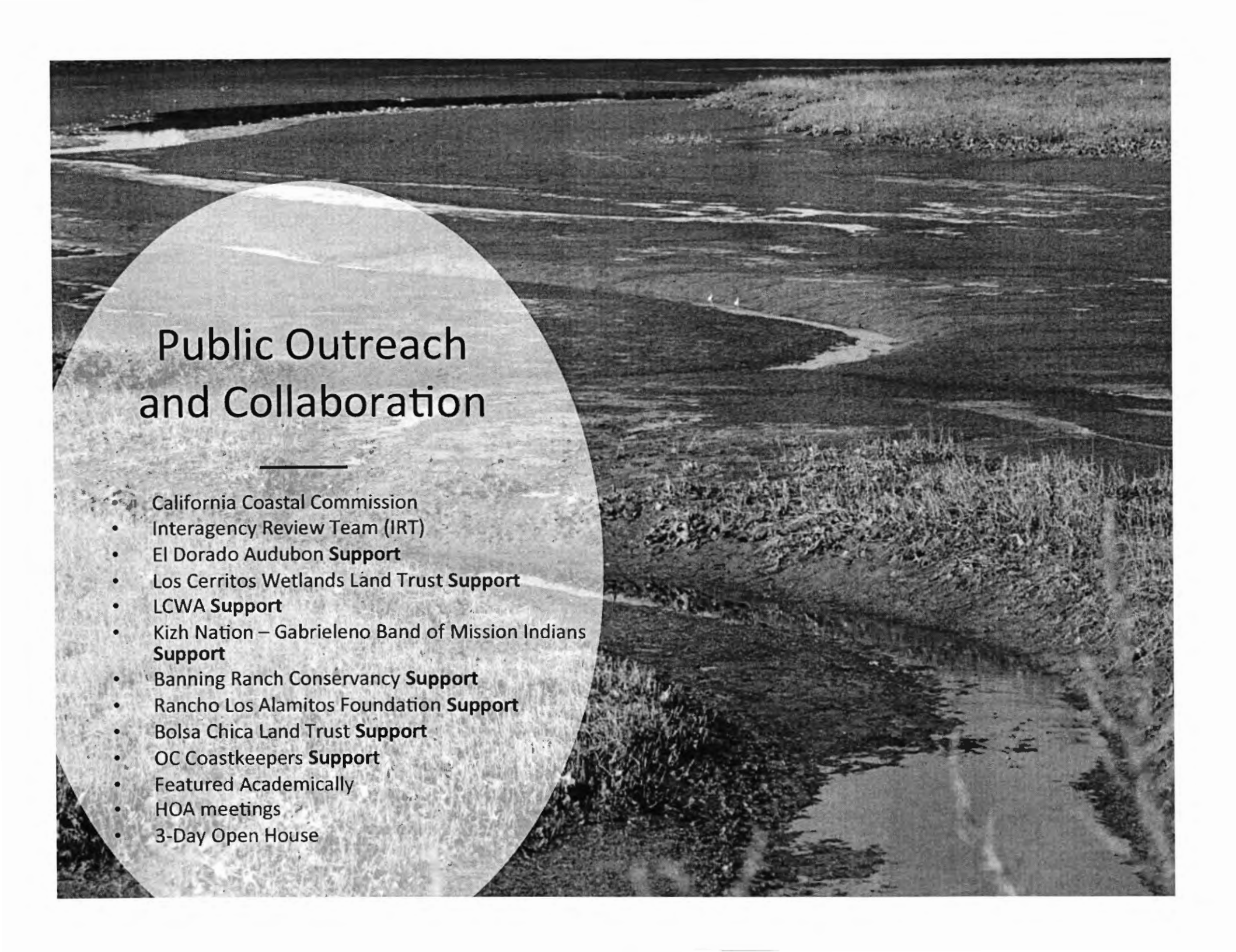
Provides Public Access

Creates New Landscaping, Sidewalks and Bike Lanes

Provides Significant New Revenue to City

Project Facts

- Initiated immediately after issuance of CDP:
 - Wetlands Restoration
 - Removal of 95% of pipelines and all tank farms
 - Sidewalks, bikeways, City entry monument and bike fix-it station
- Synergy site is transferred into public ownership with endowment to maintain wetlands in perpetuity
- Public Access to wetlands upon completion of restoration
- No fracking is proposed or allowed with eventual CDP
- Not using potable water for water injection
- Project does not induce seismicity or conduct practices like what Oklahoma has been seen with oil extraction
- Not Urban Drilling – lacks proximity to sensitive receptors, new upgraded facilities that don't have fugitive fumes, Human Health Risk Assessment complete



Public Outreach and Collaboration

- California Coastal Commission
- Interagency Review Team (IRT)
- El Dorado Audubon **Support**
- Los Cerritos Wetlands Land Trust **Support**
- LCWA **Support**
- Kizh Nation – Gabrieleno Band of Mission Indians **Support**
- Banning Ranch Conservancy **Support**
- Rancho Los Alamitos Foundation **Support**
- Bolsa Chica Land Trust **Support**
- OC Coastkeepers **Support**
- Featured Academically
- HOA meetings
- 3-Day Open House

Beach Oil Mineral Partners (BOMP) respectfully requests
approval of the
Los Cerritos Wetlands Oil Consolidation & Restoration Project
through currently proposed City of Long Beach LCPA
LCP-5-LOB-18-0026-1 and CDP 9-18-0395



July 30, 2018

Chair Dayna Bochco
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105
(415) 904-5202

Sent via e-mail to: EORFC@coastal.ca.gov

Cc: John.Ainsworth@coastal.ca.gov; Kate.Huckelbridge@coastal.ca.gov

RE: Los Angeles Waterkeeper Comments on City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

Dear Madam Chair and Honorable Commissioners,

Los Angeles Waterkeeper (LAW or Waterkeeper) thanks you for this opportunity to comment on the proposed amendments to the Long Beach certified Local Coastal Plan (LCP) referenced above.

Founded in 1993, LAW is an environmental non-profit with over 3,000 members dedicated to protecting and restoring Los Angeles County's inland and coastal waterways and ensuring an environmentally sustainable water supply for the region. LAW advocates for a "4R" approach" to our water supply: Reduce, Reuse, Recycle, Restore. This approach includes increasing conservation and efficiency measures to alleviate demand, advocating wetlands restoration projects along the coast and inland, greater investment in multi-benefit stormwater capture projects, expanding recycling of wastewater, and remediating groundwater.

LAW supports approval of the amendments to the Southeast Area Development and Improvement Plan (SEADIP) for the Long Beach certified LCP because the amendments will allow for the consolidation of the oil productions facilities onto currently vacant properties, which will in turn facilitate the regionally important ecological restoration of the Los Cerritos wetlands. Furthermore, the consolidation will result in fewer points of contact between the industrial operation/oil facilities and the surrounding environment, which should reduce the risk of industrial pollution discharging into wetlands and other environmentally important resources.

The LCP Amendments would not likely facilitate an increase in greenhouse gas (GHG) emissions associated with oil production, because the LCP Amendments would not increase oil production from the SEADIP. However, current SEADIP levels of oil production would be allowed to continue, which is a missed opportunity. Merely holding the line on GHGs is insufficient in the long term. California recently enacted AB 398, which requires more aggressive reduction in our consumption of fossil fuels and the production of greenhouse gases.¹

¹ See Assem. Bill No. 398 (2017-2018 Reg. Sess.)

California also recently announced the truly remarkable feat of having reached its 2020 GHG emissions targets well ahead of schedule.² However, deeper cuts must be made in the future, and every opportunity for carbon reduction should be considered, especially by California agencies considering actions which bear on overall California GHG emissions. We therefore request that the Commission consider the consistency of the LCP Amendment with AB 398 and other California plans for GHG reductions.

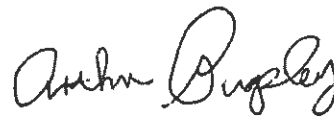
Overall, LAW supports the LCP Amendments despite our concern with a missed opportunity on GHG emissions because ecological restoration of the Los Cerritos wetlands is urgently needed, and the LCP Amendments will greatly facilitate such restoration.

LAW thanks you for your consideration of our comments.

Sincerely,



Alex Dashman
2018 Summer Law Fellow
Los Angeles Waterkeeper



Arthur Pugsley
Senior Attorney
Los Angeles Waterkeeper

² (Cal. Air Resources Board, California Greenhouse Gas Inventory for 2000-2016 — by Category as Defined in the 2008 Scoping Plan (2018).)

July 30, 2018

Kate Huckelbridge
California Coastal Commission
loscerritoswetlands@coastal.ca.gov

RE: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

I am writing to express my continued support for the Los Cerritos Wetlands Oil Consolidation and Restoration Project. I had previously worked as the Project Manager and Staff Biologist for the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC) and the Los Cerritos Wetlands Authority (LCWA) and I am strong advocate for the complete restoration of Los Cerritos Wetlands complex, which includes both private and public lands. The Los Cerritos Wetlands Oil Consolidation and Restoration Project continues the work that is underway by the RMC and the LCWA and provides public/private partnership that will provide continued funding for the long-term maintenance, management and stewardship of Los Cerritos Wetlands in perpetuity.

I am writing to support of the City of Long Beach LCP Amendment No. 1-18 ((LCP-5-LOB-18-0026-1) (SEADIP)) because it includes comprehensive wetlands and habitat restoration, provides unique public access opportunities, consolidates oil operations offsite, and will transfer ownership of a substantial portion of Los Cerritos Wetlands into the public domain. Additionally, I have long supported the restoration of the Los Cerritos Wetlands and this project further enhances public access and education opportunities. This is a unique opportunity to restore degraded habitat and provide public access.

Regards,
Luz Quinnell
34300 Sherwood Drive
Yucaipa, CA 92399



TONGVA ANCESTRAL TERRITORIAL TRIBAL NATION

A TRIBAL SOVEREIGN NATION UNDER THE UNDRIP AND AS A CALIFORNIA NATIVE AMERICAN TRIBE -VERIFIED BY ACHP AND NAHC - SB18-
AB 52-AJR 42
DNA AUTHENTICATED FOR OUR DOCUMENTED COASTAL VILLAGES AND ISLANDS RECOGNIZED BY THE STATE OF CALIFORNIA AS THE
ABORIGINAL TRIBE OF THE LOS ANGELES BASIN AND ISLANDS

RE:

July 30, 2018

[1] ITEM 6 [F] COMMISSION'S TRIBAL CONSULTATION POLICY -TATTN / JTR
CONCURRENCE AND SUPPORT FOR THE CCC TCP -PLEASE VOTE TO APPROVE OF
IT-

[2] ITEM 14 [A] REVISED FINDINGS - AUGUST 2018 CD-0001-18 (US NAVY,
SOUTHERN CALIFORNIA) CD-0001-18 (US NAVY, SOUTHERN CALIFORNIA)
CONSIDERATION OF FINDINGS FOR COMMISSION'S ACTION ON JUNE 6, 2018, TO
OBJECT TO CONSISTENCY DETERMINATION BY U.S. NAVY FOR 5-YEAR MILITARY
READINESS TRAINING AND TESTING PROGRAM ACTIVITIES IN THE CALIFORNIA
PORTION OF THE HAWAII-SOUTHERN CALIFORNIA TRAINING AND TESTING
(HSTT) STUDY AREA, SOUTHERN CALIFORNIA. (MPD-SF) TATTN / JTR
CONCURRENCE AND SUPPORT FOR THE CCC REJECTION/OBJECTION -PLEASE
VOTE ACCORDINGLY

[3] TATTN CONCERNS ON EXISTING AND PROPOSED AMENDMENT TO CLB LOS
CERRITOS OIL CONSOLIDATION AND WETLANDS RESTORATION PROJECT/ LCP
FOR THE - OIL MINERALS PARTNERS PROJECT IN LOS CERRITOS WETLANDS,
LONG BEACH OILFIELD OPERATIONS [PLEASE SEE THE REQUESTED CCC
DETERMINATIONS AND VOTES BELOW]

TO: MR. AINSWORTH AND THE CA COASTAL COMM-

Greetings And Salutations, TATTN Remains Concerned About The proposed LCP
AMENDMENT For Los Cerritos Oil Consolidation and Wetlands Restoration Project/ Beach
Oil Minerals Partners Project And Existing Polluted Areas Located There.

Those Operations Are In Violations To Numerous State And Federal Laws And
Codes /CCFR'S. Please Be Advised And Please Take Formal Notice That TATTN Objects And
Opposes Any Increased Or Expansion Of Those Oilfields And Any Additional
Infrastructure. Including Drilling Any New Wells And Building /Installing Infrastructure,

JOHN TOMMY ROSAS
TRIBAL ADMINISTRATOR
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And All Should Be Phased Out Drilling And Initiate Full Remediation Operations Immediately.

Specifically, TATTN Requests The CCC To Immediately Ban All Oil Wells, Enhanced Oil Recovery And Wastewater Injection. Immediately Stop Issuing Permits For New Wells Or Infrastructure, Unless Required For Osha Safety Or Repairs As Deemed Required By DOGGR . The Proposed CLB LCP AMENDMENT Should Be Rejected And Sent Back To CLB And Have Their EIR Corrected /Amended Accordingly. OR THE CCC SHOULD IMPLEMENT THE SPECIAL CONDITION 23. CULTURAL RESOURCES SURVEY. PRIOR TO THE ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, THE APPLICANT SHALL SUBMIT FOR THE REVIEW AND WRITTEN APPROVAL OF THE EXECUTIVE DIRECTOR AN ARCHEOLOGICAL RESEARCH PLAN, PREPARED CONSISTENT WITH SPECIAL 22.

TATTN Also Requests That The CCC To Require The CITY OF LONG BEACH And The EXISTING/NEW OIL CORPS To Formulate An Amortization Study And Create A Plan To Phase Out All Existing Oilfield Operations, Starting With The Wells Closest To Homes And Schools, And Restore The Site To A Beneficial Use For The Community With Appropriate Remediation With The Oil Corporations Funding All Costs To Perform As They Are The Parties Liable And Responsible To Remediate The Property To A Restored Condition.

For The Record TATTN Objects And Opposes The Illegal And Defective CCC LOS CERRITOS Oil Field CLB LCP Amendments As It Is Considering Currently.

Thank You For Your Attention To Our Concerns –[Please read Following Correspondence to Kate] [I made some clarifications for the purposes of the CCC hearing]

Johntommy Rosas

to Kate.Huckelbridge

Fri, Jul 27, 3:10 PM (3 days ago) EXACT COPY EXCEPT FOR MY ADDED 'IN BOLD'

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Accordingly to be clear from the info I have submitted and the latest CCC staff report -

TATTN/JTR will only support

MOTIONS 1 and MOTION 3

TATTN objects and opposes the other motions-as illegal and defective-

Motion I: I move that the Commission certify Land Use Plan Amendment No. 1-18 to the City of Long Beach Land Use Plan as submitted by the City of Long Beach. **Staff recommends a NO vote.** Failure of this motion will result in denial of the LUP Amendment as submitted and adoption of the following resolution and findings. The motion passes only by affirmative vote of the majority of the appointed Commissioners.

Resolution I: The Commission hereby denies certification of Land Use Plan Amendment No. 1-18 as submitted by the City of Long Beach and adopts the findings set forth below on the grounds that the amendment does not conform with the policies of Chapter 3 of the Coastal Act. Certification of the Land Use Plan amendment would not comply with the California Environmental Quality Act because there are feasible alternatives or mitigation measures which could substantially lessen any significant adverse impact which the Land Use Plan Amendment may have on the environment. LCP-5-LOB-18-0026-1 (City of Long Beach)

Motion III: I move that the Commission **reject** the Amendment to the Implementation Program for the City of Long Beach certified LCP as submitted. **Staff recommends a YES vote. Passage of this motion will result in rejection of Implementation Program Amendment and the adoption of the following resolution and findings.** The

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motion passes only by an affirmative vote of a majority of the Commissioners present. Resolution III: The Commission hereby denies certification of the Amendment to the Implementation Program submitted for the City of Long Beach certified LCP and adopts the findings set forth below on grounds that the Amendment to the Implementation Program as submitted does not conform with, and is inadequate to carry out, the provisions of the certified City of Long Beach Land Use Plan, as amended. Certification of the Amendment to the Implementation Program would not meet the requirements of the California Environmental Quality Act as there are feasible alternatives and mitigation measures that would substantially lessen the significant adverse impacts on the environment that will result from certification of the Amendment to the Implementation Program as submitted.

**/S/ JOHNTOMMY ROSAS / TRIBAL ADMINISTRATOR
TRIBAL LITIGATOR -FOR TATTN
TONGVA ANCESTRAL TERRITORIAL TRIBAL NATION**

Johntommy Rosas <tattnlaw@gmail.com> Mon, Jul 23, 1:41 PM
(7 days ago)
to Teresa@Coastal, Cassidy@Coastal, Craig, Kate.Huckelbridge

Hi Kate -

1. TATTN/ I are suggesting that you please call and speak with Teresa Henry
the CCC district manager in long beach-ASAP-TATTN is/have/has worked with Teresa on numerous projects including the Banning Ranch / Horizontal Development Oil Extraction Abandonment and Consolidation Project-her knowledge and expertise on these types of projects is crucial and should be sought by you /CCC -I know she is bily but I am sure she can assist you on this project -

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2. TATTN/JTR is requesting that the same "banning ranch protocol" be applied on this very similar proposed project -Los Cerritos Oil Consolidation and Wetlands Restoration Project.
3. And the same issues are currently unresolved at los cerritos which are the TRIBAL CULTURAL RESOURCE site locations and perimeters- which have to be known to legally and as required avoid all tribal cultural resources /sites there-There was a skull uncovered there and many sites listed/documentated but remains incomplete and requires more testing by the STP'S process or small excavating equipment-
4. TATTN is hopeful the same CCC protocol is applied at los cerritos including the TCR testing and should happen before and decisions are made or considered - that should also include continued tribal consultation with the new CCC TRIBAL CONSULTATION POLICY -
5. If The CCC Fails To Implement The Same "**BANNING RANCH / HORIZONTAL OILFIELD PROTOCOL** " At The Los Cerritos Wetlands Oilfields - The Result Would Be The CCC Committing Several Violations To Our Tribal Rights And To Numerous Laws Under Both State And Federal -
6. TATTN Also Advises And Requests A Continuance On The CCC Hearing For This Proposed Project /Amendment Until The Archaeological Testing Is Completed pursuant to the HORIZONTAL CDP SPECIAL CONDITION 23 WITH SC 22 And Studied Including The Required Tribal Consultation With TATTN- For The TCR Site Delineations - That Will Clearly Show Where The Projects Potential Negative Adverse Impacts Would Occur-
7. TATTN is also requesting that the CITY OF LONG BEACH request the continuance as well- that way TATTN and CLB can work out the required details for testing in cooperation and concurrence with CCC - TATTN has consulted on numerous projects with CLB's Craig Chalfant who is cc'd on this reply-TATTN looks forward to your responses in a timely manner-/s/ JOHNTOMMY ROSAS

JOHN TOMMY ROSAS

TRIBAL ADMINISTRATOR

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LCW CASE EXHIBIT

34

19-000231	CA-LAN-231	Dixon 1961	Shell Midden
19-000232	CA-LAN-232	Dixon 1961	Shell Midden
19-000233	CA-LAN-233	Dixon 1961	Shell Midden with Lithic Artifacts
19-000271	CA-LAN-271	Dixon 1959	Shell Midden (destroyed by oil well development)
19-000272	CA-LAN-272	Dixon 1961; Brooks, Conrey & Dixon 1965	Human Skull

I made a few clarifications to the above its essentially the same -see original in the correspondences for this item ///



Johntommy Rosas <tattnlaw@gmail.com>

Jul 23, 2018, 2:14 PM (7 days ago)

to Kate.Huckelbridge, Teresa@Coastal, Cassidy@Coastal, Craig

Please take formal NOTICE that TATTN is lodging its OBJECTIONS AND OPPOSITION

the proposed Los Cerritos Oil Consolidation and Wetlands Restoration Project/ Beach Oil Minerals Partners Project in Los Cerritos Wetlands, Long Beach-

based on the grounds listed in the previously sent email form us/TATTN



Johntommy Rosas <tattnlaw@gmail.com>

Jul 23, 2018, 2:41 PM (7 days ago)

to Kate.Huckelbridge

Kate -

Can you please send us the CCC staff report for the los cerritos project

JOHN TOMMY ROSAS
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And

TATTN supports the CCC objection to
CD-0001-18 (US Navy, Southern California)
Consideration of findings for Commission's action on June 6, 2018, to object
to Consistency Determination by U.S. Navy for 5-Year Military Readiness
Training and Testing Program Activities in the California portion of the
Hawaii-Southern California Training and Testing (HSTT) Study Area,
southern California. (MPD-SF)

thanks jt

////

Johntommy Rosas <tattnlaw@gmail.com>

Jul 23, 2018, 3:00 PM
(7 days ago)

to Teresa@Coastal, Cassidy@Coastal, Craig, Kate.Huckelbridge

example of required conditions and NOI language -except for the approval
NOTICE OF INTENT TO ISSUE PERMIT (Upon satisfaction of special
conditions)

THE SOLE PURPOSE OF THIS NOTICE IS TO INFORM THE APPLICANT OF THE
STEPS NECESSARY TO OBTAIN A VALID AND EFFECTIVE COASTAL
DEVELOPMENT PERMIT

("CDP"). A Coastal Development Permit for the development described below
has been approved but is not yet effective. Development on the site cannot
commence until the CDP is effective.

In order for the CDP to be effective, Commission staff must issue the CDP to
the applicant, and the applicant must sign and return the CDP.

Commission staff cannot issue the CDP until the applicant has fulfilled each
of the "prior to issuance" Special Conditions. A list of all the Special
Conditions for this permit is attached.

2. Construction Permits. PRIOR TO THE INITIATION OF CONSTRUCTION
ACTIVITIES, the Permittee shall provide for Executive Director review, all
necessary building, construction and wetland fill or alteration
permits that may be required by federal, state, or local agencies

JOHN TOMMY ROSAS

TRIBAL ADMINISTRATOR

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including the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, California Department of Fish and Wildlife, Santa Ana Regional Water Quality Control Board, and Orange County. Any modifications to the project or its design, configuration, or implementation that occur as a result of these agencies' review and authorization processes shall be provided to the Executive Director for review to determine if an amendment to this coastal development permit is legally required.

Wetland Mitigation Plan.

A. PRIOR TO THE INITIATION OF CONSTRUCTION FOR ANY DEVELOPMENT AUTHORIZED BY THIS COASTAL DEVELOPMENT PERMIT THAT WILL IMPACT WETLANDS, the Permittee shall submit for review and written approval of the Executive Director a Wetland Mitigation Plan to mitigate for all wetland impacts associated with the proposed construction or installation activities. The Plan shall be developed in consultation with the California Department of Fish & Wildlife, Regional Water Quality Control Board and U.S. Army Corps of Engineers, as applicable, and at a minimum shall include:

22. Protection of Cultural Resources. The Permittee shall implement the requirements of the Protection of Cultural Resources Special Condition provided in Appendix A.

23. Cultural Resources Survey. PRIOR TO THE ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the Applicant shall submit for the review and written approval of the Executive Director an Archeological Research Plan, prepared consistent with Special Condition 22. The tasks required by the plan shall be undertaken prior to any ground disturbance for well or pipeline abandonment outside of the Oil Remainder Areas (ORAs) or for drilling, construction, installation, or demolition within the ORAs and shall incorporate the following measures and procedures:

A. Within the ORAs and proposed work areas for well abandonment and pipeline abandonment/replacement, the applicant shall undertake additional archeological testing to determine the boundary of known prehistoric

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archeological sites and, where necessary, testing (including the use of cadaver dogs or other test methods recommended by peer review) to ensure that all other prehistoric archeological sites that may be present on the sites are identified and accurately delineated (to the maximum extent practicable and in accordance with current professional archeological practices). The purpose of any further testing is to locate and delineate the boundaries of all prehistoric cultural deposits present on the site and to avoid disturbance to those deposits by any of the development contemplated by the Applicant in its proposal;

B. If any cultural deposits, including but not limited to skeletal remains and grave-related artifacts, traditional cultural, religious or spiritual sites, midden and lithic material or artifacts, are discovered during the additional archeological testing they shall not be exposed and the testing shall be immediately halted in this location. Additional testing shall be conducted further from the center of the discovery until sterile conditions are encountered. The Archeological Research Plan does not authorize the excavation of any cultural deposits nor data recovery. Nothing in this condition shall prejudice the ability to comply with applicable State and Federal laws if human remains are encountered.

However, in compliance with applicable State and Federal laws the project archaeologist shall work with the County Coroner and other authorities to allow Native American human remains to be left in situ, to the maximum extent practical.

C. The Archeological Research Plan shall identify proposed mitigation measures for the preservation in place, recovery and/or relocation/reburial of prehistoric cultural deposits consistent with Native American Tribal guidance that shall be undertaken only if the Executive Director has determined that impacts to cultural deposits are necessary and unavoidable;

D. Archeological and cultural resource monitoring shall be consistent with Special Condition 22;

E. Implementation of the Archeological Research Plan shall not occur until this coastal development permit has been issued.

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AB 52-AJR 42
DNA AUTHENTICATED FOR OUR DOCUMENTED COASTAL VILLAGES AND ISLANDS RECOGNIZED BY THE STATE OF CALIFORNIA AS THE
ABORIGINAL TRIBE OF THE LOS ANGELES BASIN AND ISLANDS

////

Johntommy Rosas <tattnlaw@gmail.com>

Jul 27, 2018, 3:01
PM (3 days ago)

to Kate.Huckelbridge

Kate -

this section should clearly state " testing " as part of the investigation-
I can assist and monitor for the plan as we did on banning ranch
/// vi. An analysis of impacts to paleontological, archeological, tribal and other cultural resources. This analysis shall include the results of an investigation to determine if paleontological, archeological, tribal and other LCP-5-LOB-18-0026-1 (City of Long Beach) 12 cultural resources are present in the project area and, if applicable, a monitoring and mitigation plan that describes how the project will avoid or minimize significant impacts to paleontological, archeological, tribal and other cultural resources.



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Jul 27, 2018, 3:08
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we really need a special condition 23& 22 -per banning ranch
and in that way CCC is consistent -

until the testing and special condition 22/23 is incorporated
we will have to object & oppose the staff report on those grounds stated
above as deficient- [END OF EXHIBITS]

JOHN TOMMY ROSAS
TRIBAL ADMINISTRATOR
TRIBAL LITIGATOR - TATTN JUDICIAL # 0001
578 WASHINGTON BLVD #384 MARINA DEL REY, CA 90292
310-570-6567
TATTNLAW@GMAIL.COM JTR@TONGVANATION.ORG



Officers:

Terry Welsh, M.D.
President

7/29/18

Suzanne Forster
Vice-President

Kate Huckelbridge, CA Coastal Commission

Deborah Koken
Secretary

Item at August 2018 hearing: City of Long Beach LCP
Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)

Mary Bossy
Treasurer

Steve Ray
Executive Director

Position: **SUPPORT WITH STAFF'S
RECOMMENDATIONS**

Board Members:

To the California Coastal Commissioners:

Diane Silvers, Ed.D.

The Banning Ranch Conservancy is a 501(c)(3) non-profit land conservancy with the mission to, *"Preserve, Acquire, Conserve and Manage the entire Banning Ranch as a Permanent Public Open Space, Park and Coastal Nature Preserve."*

Jennifer Frutig, Ph.D.

Rick Huffman

Cindy Black

Jan Vandersloot, M.D.
In Memoriam

The Banning Ranch Conservancy has been closely following the development of the Los Cerritos Wetland Restoration Plan as certain elements at both Los Cerritos Wetlands and Banning Ranch are similar. Both Los Cerritos Wetlands and Banning Ranch contain privately owned coastal wetlands containing active oil operations. Both sites also contain biologically rich and vanishingly rare coastal wetland habitat.

Mailing Address:

P.O. Box 15333
Newport Beach CA
92659-5333

Purchasing all land and mineral rights and removing all oil operations, while preferable, is an extremely expensive option. In the meanwhile, the concept of working with the land and mineral rights ownership, local environmental groups and communities, and public agencies to consolidate the oil operations to a smaller platform, while restoring the abandoned areas and dedicating them to the public is both an effective and financially attainable method of preserving our remaining coastal wetlands; wetlands that once were widespread but have been reduced to 5% of their original extent.

Phone:

(714) 719-2148

While the Banning Ranch Conservancy is currently exploring purchasing surface land rights at Banning Ranch, the Los Cerritos Wetland Restoration Plan, negotiated between the City of Long Beach, Beach Oil Mineral Partners (BOMP) and other parties, is particularly well-suited for the area, given the land ownership history of the site.

The Banning Ranch Conservancy supports City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP) with the modifications recommended by your staff.

Sincerely,

A handwritten signature in cursive script, reading "Terry Welsh", is written over a horizontal line.

Terry Welsh, M.D.
President, Banning Ranch Conservancy



California Cultural Resource Preservation Alliance, Inc.
An alliance of American Indian and scientific communities working for
the preservation of archaeological sites and other cultural resources.

P.O. Box 54132
Irvine, CA 92619-4132

July 28, 2018

Kate Huckelbridge
Senior Environmental Scientist
California Coastal Commission
45 Fremont Suite 2000
San Francisco, CA 94105-2219

SUBJECT: Staff Report for W 15A City of Long Beach Local Coastal Program (LCP) Amendment
Request o. 1-18 (LCP-5-LOB-18-0026).

Dear Ms. Huckelbridge:

Thank you for the opportunity to review and comment on the staff report for the above-mentioned undertaking. I think you tried your best to come up with modifications that would allow oil and gas development within the Pumpkin Patch site (part of Subarea 25) and the Los Cerritos Wetlands Authority site, but even these extensive suggested modifications can't correct for a flawed and hazardous project.

The modifications reflect a lot of work on your part and we appreciate the attempt to provide protection for cultural resources including archaeological sites and Tribal Cultural Resources. As you indicate in your report, the entire SEADIP area is sensitive for paleontological, archaeological and tribal resources, potentially including Sacred Lands, Tribal Cultural Landscapes and Traditional Cultural Property. While avoidance and preservation are the preferred mitigation for archaeological sites, **the only way** to protect Tribal Cultural Resources is by avoidance and this is not feasible given the plan for new oil development where oil and gas is currently not allowed.

Although you did your best I also don't see how the proposed modifications can minimize the hazards to the nearby waterways, the struggling wetlands, and the Newport-Inglewood fault. There is evidence to indicate that deep drilling caused the horrific 1933 earthquake. Are they going to slant drill into that fault? Then there is the concern about depletion of the water table, especially during the drought conditions, and sea level rise and flooding. It just seems a no-brainer that new oil development here is a bad risk.

Sincerely,

Patricia Martz, Ph.D., President

Tagab, Clarita@Coastal

From: Johntommy Rosas <tattnlaw@gmail.com>
Sent: Friday, July 27, 2018 6:15 PM
To: Huckelbridge, Kate@Coastal
Subject: Re: Outreach regarding the Beach Oil Minerals Partners Project in Los Cerritos Wetlands, Long Beach

Accordingly to be clear from the info I have submitted and the latest CCC staff report - TATTN/JTR will only support MOTIONS 1 and MOTION 3
TATTN objects and opposes the other motions-as illegal and defective-

Motion I: I move that the Commission certify Land Use Plan Amendment No. 1-18 to the City of Long Beach Land Use Plan as submitted by the City of Long Beach. Staff recommends a NO vote. Failure of this motion will result in denial of the LUP Amendment as submitted and adoption of the following resolution and findings. The motion passes only by affirmative vote of the majority of the appointed Commissioners. Resolution I: The Commission hereby denies certification of Land Use Plan Amendment No. 1-18 as submitted by the City of Long Beach and adopts the findings set forth below on the grounds that the amendment does not conform with the policies of Chapter 3 of the Coastal Act. Certification of the Land Use Plan amendment would not comply with the California Environmental Quality Act because there are feasible alternatives or mitigation measures which could substantially lessen any significant adverse impact which the Land Use Plan Amendment may have on the environment. LCP-5-LOB-18-0026-1 (City of Long Beach)

Motion III: I move that the Commission reject the Amendment to the Implementation Program for the City of Long Beach certified LCP as submitted. Staff recommends a YES vote. Passage of this motion will result in rejection of Implementation Program Amendment and the adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present. Resolution III: The Commission hereby denies certification of the Amendment to the Implementation Program submitted for the City of Long Beach certified LCP and adopts the findings set forth below on grounds that the Amendment to the Implementation Program as submitted does not conform with, and is inadequate to carry out, the provisions of the certified City of Long Beach Land Use Plan, as amended. Certification of the Amendment to the Implementation Program would not meet the requirements of the California Environmental Quality Act as there are feasible alternatives and mitigation measures that would substantially lessen the significant adverse impacts on the environment that will result from certification of the Amendment to the Implementation Program as submitted.

On Fri, Jul 27, 2018 at 3:46 PM Johntommy Rosas <tattnlaw@gmail.com> wrote:
ok thanks for the explanation -Kate
I will trust you that it will happen as you stated
and based on that I will not object and oppose it -

thanks you have a good weekend as well
thanks for all your work on this -I know it wasnt easy, jt

On Fri, Jul 27, 2018 at 3:39 PM Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov> wrote:

Johntommy,

Thanks for your emails. If we get to the CDP for the BOMP project, I agree with you that we will need much more detailed conditions related to discovery and protection of tribal and cultural resources – like the ones included in the Horizontal Oil/Banning Ranch permit. For the LCP amendment covered in this staff report, the goal was to include an overarching policy that would lead to a more detailed requirement for a site-specific investigation and monitoring and mitigation plan when specific development is being considered.

As far as SHPO, based on the policy we included (Section vi that you included in your first email), at the CDP stage, an applicant will be required to conduct an investigation and develop a monitoring and mitigation plan regardless of what SHPO does.

I understand if you object to the recommendations in the staff report – I just wanted to explain where I was coming from and why the policy language in this LCP amendment was more general than a CDP condition would generally be.

Let me know if you'd like to discuss further. Have a good weekend!

Kate

From: Johntommy Rosas [mailto:tattnlaw@gmail.com]

Sent: Friday, July 27, 2018 3:08 PM

To: Huckelbridge, Kate@Coastal

Subject: Re: Outreach regarding the Beach Oil Minerals Partners Project in Los Cerritos Wetlands, Long Beach

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On Fri, Jul 27, 2018 at 2:53 PM Johntommy Rosas <tattnlaw@gmail.com> wrote:

Thank you for the update Kate

On Fri, Jul 27, 2018 at 2:52 PM Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov> wrote:

As a follow-up, I wanted to let you know that our staff report for the LCP amendment related to the BOMP project (see below) has been posted. You can view or download a copy here: <https://www.coastal.ca.gov/meetings/agenda/#/2018/8>

The item number is W15a. Stay on the Wednesday tab and scroll down until you get to the Energy, Ocean Resources and Federal Consistency section. Find item 15a and click on the title of the item. If you have any trouble viewing the staff report, please let me know and I will email you a copy.

If you have any questions, would like to discuss this LCP amendment, or would like to submit a public comment, please contact me kate.huckelbridge@coastal.ca.gov or call me at 415-396-9708.

Kate Huckelbridge

From: Huckelbridge, Kate@Coastal
Sent: Monday, July 16, 2018 11:12 AM
To: Huckelbridge, Kate@Coastal
Subject: Outreach regarding the Beach Oil Minerals Partners Project in Los Cerritos Wetlands, Long Beach

Hello! I am writing to you regarding the Los Cerritos Oil Consolidation and Wetlands Restoration Project. As you are likely aware, the City of Long Beach approved a Final EIR and permits for this project which is proposed by Beach Oil Minerals Partners (BOMP) and involves an expanded and consolidate oil production operation on two new sites in Long Beach and the restoration of the existing Synergy oil field to tidal wetlands over a 40 year period. I believe the City reached out to you as part of a tribal consultation process.

This project also requires approval by the Coastal Commission. This is a two-phase process. The first phase is a hearing on an amendment to the City of Long Beach's Local Coastal Program (LCP) which is currently scheduled for the Commission's August hearing (August 8-10). The second phase will be a hearing on a Coastal Development Project for the BOMP project which is likely to be scheduled for later this year.

I am reaching out to you in advance of our scheduled hearing to see if you have any additional thoughts or concerns you would like to share with the Coastal Commission regarding this project and the proposed land use changes within the City of Long Beach. Please feel free to email or call me (at the number below) if you wish to discuss this project and the Commission's upcoming hearing or if you have any questions.

Thank you for your time and attention!

Kate Huckelbridge

Kate Huckelbridge, PhD

California Coastal Commission

Energy, Ocean Resources & Federal Consistency Division

45 Fremont St. Ste. 2000

San Francisco, CA 94105

415-396-9708

Error! Filename not specified.

Every Californian should conserve water. Find out how at:

Error! Filename not specified.

SaveOurWater.com · Drought.CA.gov

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JOHN TOMMY ROSAS
TRIBAL ADMINISTRATOR
TRIBAL LITIGATOR -TATTN JUDICIAL # 0001
TONGVA ANCESTRAL TERRITORIAL TRIBAL NATION

A TRIBAL SOVEREIGN NATION UNDER THE UNDRIP AND AS A TREATY [s] SIGNATORIES RECOGNIZED TRIBE, WITH HISTORICAL & DNA AUTHENTICATION ON CHANNEL ISLANDS AND COASTAL VILLAGES - AND AS A CALIFORNIA NATIVE AMERICAN TRIBE / SB18-AB 52-AJR 42-ACHP/NHPA - CALIFORNIA INDIANS JURISDICTIONAL ACT U S CONGRESS APPROVED MAY 18, 1928 45 STAT. L 602

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CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
FAX: (831) 427-4877
WEB: WWW.COASTAL.CA.GOV



W15a

A LCP-5-LOB-18-0026-1 (CITY OF LONG BEACH)

AUGUST 8, 2018

CORRESPONDENCE

July 25, 2018

Protect the Long Beach/Los Cerritos Wetlands submits the following comments to the California Coastal Commission regarding the City of Long Beach LCP Amendment Request No. 1-18 (LCP-5-LOB-18-0026-1)

In requesting the above Amendment to its Local Coastal Program, the main objective of the City of Long Beach is to add the two new drilling sites proposed in The Los Cerritos Wetlands Restoration and Oil Consolidation Project and the City's only rationale is the "wetlands restoration" promised by the project proponents. The City of Long Beach Planning Commission approved the above Amendment to the certified Local Coastal Program/SEADIP, including changes to its Oil Code (Title 12), in conjunction with its approval of the Los Cerritos Wetlands Restoration and Oil Consolidation Project. Protect the Long Beach/Los Cerritos Wetlands appealed this decision to the Long Beach City Council and continues to oppose this Amendment to the Local Coastal Program (LCP) as well as the project itself.

Our objections to the Amendment to the Local Coastal Program and Oil Code now before you are summarized as follows:

I. Flawed process by private and public actors

- lack of outreach and public input regarding an Amendment to a Local Coastal Program and Oil Code involving public agencies, public lands, and public resources.

II. Failure to uphold the Coastal Act and non-compliance with stated objectives of environmental protection on the part of the LCWA and its member agencies the Coastal Conservancy and the San Gabriel Lower River and Mountains Conservancy.

- Involvement of the LCWA, the California Coastal Conservancy, and the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy in new oil operations on new sites in and around the Los Cerritos Wetlands
- the conveyance of public land under their jurisdiction (the LCWA site) for the sole purpose of establishing a new location for oil extraction and production in and around the Los Cerritos Wetlands. The LCWA's original conceptual restoration plan for the Los Cerritos Wetlands sites a visitor's center on the property slated for oil operations under the proposed LCP Amendment.
- the participation in a mitigation bank scheme to "restore" lands that are not in need of restoration while potentially destroying existing wetlands habitat and enabling environmental destruction elsewhere

II. Inaccurate Conclusions

Conclusions of No or Mitigated environmental impacts as regards to oil operations are inaccurate and cannot be substantiated.

IV. Causes irreparable harm to the California Coast

This Amendment to the Local Coastal Program and Oil Code of the City of Long Beach would:

- violate the rights of California Indians and other tribal peoples to protect coastal sacred sites and a traditional tribal landscape and to maintain tribal cultural practices
- violate environmental justice policies of the Coastal Act by failing to outreach to and involve marginalized communities in the decision making process
- violate environmental justice policies of the Coastal Act by failing to address the impacts of expanded fossil fuel extraction on marginalized frontline communities in Seal Beach, Long Beach, and the South Bay
- employ “unconventional” and “enhanced” drilling methods posing risks and having consequences to public health, the environment, and tribal culture that cannot be mitigated
- establish new oil operations on and adjacent to wetlands and ESHA habitat, across and adjacent to an active fault, near proposed residential development and marine habitat
- have unavoidable negative environmental impacts on the ecosystems of the Los Cerritos Wetlands, Alamitos Bay, Colorado Lagoon, San Gabriel River, and Coastline

The LCP should not be amended to allow fossil fuel/oil extraction on the LCWA property at 2nd St and Studebaker Rd. This property is not currently, nor has ever been, the site of oil extraction operations. It is public property, not the property of an oil company. It was acquired by Long Beach Earth Corps and subsequently by the LCWA with the restriction that it be used for wetlands restoration. Public actors, including the LCWA and the California Coastal Conservancy, are violating the Coastal Act and the public trust by contracting to build a new oil production facility on this site.

The City of Long Beach, cannot argue a need for additional sites from which to drill for oil. We are overwhelmed with oil drilling operations, including our offshore islands where we have fracked, neighborhood drilling sites throughout the city, and active oil fields on Signal Hill. As we understand it, the requested Amendment to the Local Coastal Program and Oil Code may not be restricted to a developer nor may conditions be imposed relative to a particular project. While the Coastal Commission may “propose modifications” to the requested Amendment of the LCP, we can find no value in its approval. To site new oil operations on the LCWA and Pumpkin Patch properties will

allow “even more land to be destroyed” (Chief Anthony Morales, Tongva). While SEADIP may be “old, not great, and outdated,” we prefer the existing document, as is, to the Amended version being requested by the City of Long Beach. Regardless of its bright and shiny elements, this Amendment is meant to undo existing Coastal Act protections for the Los Cerritos Wetlands and surrounding communities.

The proposed “wetlands restoration” referenced in this application is a sales pitch that leaves it up to the buyer to beware of the risks and consequences of adding new drilling sites adjacent to protected wetlands bisected by the Newport Inglewood Fault. Additionally, the City states in this application that these new sites are not near residential developments, failing to mention that its new Local Coastal Plan (SEASP) will allow for a wall of five to seven story buildings along PCH between the San Gabriel River and Loynes Drive, hosting malls and apartment units housing thousands of new residents in upscale developments. This cut and paste preview presents a misleading view of the project area. New oil platforms, tanks, drilling rigs, and pipelines will not actually be banished to sites far from the wetlands and residents. They will be yards from new “Gateway” developments, adjacent to and bisecting ESHA habitat, across the street from the fault zone and crossing the fault line. Below the surface drilling will expand under the wetlands and could extend up to seven miles from the platform sites.

There are added risks and no real reason for the Coastal Commissioners to grant the City’s request. The proposed Amendments to the LCP have already been included in a new LCP (SEASP) which the City could chose to submit to the Coastal Commission at any time. Additionally, the Los Cerritos Wetlands Restoration and Oil Consolidation Project, referenced as the justification for the new oil drilling sites in the Amended SEADIP, has already been submitted to Coastal Commission staff for review. It would be circumspect for the Commission to rule on the project (allowing the Commission to set conditions on both oil operations and the proposed wetlands “restoration”) and on SEASP rather than amend an LCP (SEADIP) that has already been rejected by the City.

The physical and psychological impacts of the proposed Amendment to the LCP cannot be understood without some knowledge of the modern history of the Los Cerritos Wetlands and the ongoing struggles to preserve both tribal culture and remnants of a once magnificent estuary. Mola’s proposed residential development and golf course extending along the fault from Seal Beach Blvd into the wetlands and a strip mall on the National Register site of Puvungna at CSULB were defeated by community members who valued protecting living ecosystems and respecting the burial and cultural sites of tribal peoples. SEADIP was a grassroots effort to slow the relentless expansion

of commercial and residential development along PCH near the Los Cerritos Wetlands. Since it was enacted, efforts by pro-development forces to evade and/or amend it have been relentless. A multi-story glass Home Depot Design Center on Studebaker Rd at the edge of the wetlands and a 12 story mixed-use development at 2nd and PCH, did not conform to SEADIP but were approved by city officials. Community opposition, including legal action against the city, prevented the harm these projects would have done to wetlands wildlife, especially migratory birds.

Such struggles continue because what is protected remains a target for exploitation and abuse. Tribal burials saved from Mola, were later unearthed by the Heron Pointe developers, who, when confronted by Tongva tribal monitors, were forced to “mitigate” by altering their project. CSULB finally released its collection of Tongva ancestral remains which tribal members have now reinterred at Puvungna. Currently, however, the University is allowing contractors to use another part of this National Register site, adjacent to where ceremonies are held, as a staging area and heavy equipment storage lot. Studebaker Rd. will soon host So Cal Edison’s new natural gas facility and AES’s “world’s largest” lithium battery storage facility (no EIR required).

The community has invested time and treasure in the preservation and restoration of the Los Cerritos Wetlands. We should not be held hostage by private and public entities who are colluding to expand the very industry that has laid waste to them for the past hundred years. Our survival, and that of the Los Cerritos Wetlands, depends not on extracting more oil, but on keeping it in the ground. The Coastal Act was born out of a need to protect and preserve our coastal lands and waters for the benefit of all. It is an imperfect but powerful law and we ask that you to consider how best to interpret and apply it in the face of the clear and present danger presented by the expanding extraction of fossil fuels, on and offshore.

The public entities involved in the land exchange, the proposed project, and the request for an Amendment to the LCP, have failed to conduct public outreach in a manner that clearly explains these actions and their risks.

Tribal individuals and tribal organizations have approached the City of Long Beach, the LCWA, the Coastal Conservancy, the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy and other public agencies with their concerns that the Los Cerritos Wetlands not be further desecrated. Due to both a long history of colonization and extensive industrial, commercial and residential development, very few places remain where local California Indian tribes can connect with their origins and continue ceremony and other cultural activities.

Against all odds, the monumental efforts of tribal nations to protect tribal lands continues. The proposed LCP amendment, when seen in the context of tribal efforts to protect the Los Cerritos Wetlands, Hellman Ranch, and the National Register site of Puvungna, is, as Chief Anthony Morales stated recently, “genocide.” Chief Morales, Chief Vera Rocha, Lillian Robles, Rebecca Robles, Gloria Arrelanes, Angela Mooney D’Arcy, and Alfred Cruz speak for Tongva and Acjachemen ancestors and the land itself. They present a unified vision for how best to move forward in manner that respects and sustains life, not commerce, life.

The Protect the Long Beach/Los Cerritos Wetlands coalition has made a concerted effort to reach out to local officials, including LBDS, city, county, state and federal office holders, the LCWA, the Rivers and Mountains Conservancy, and the Coastal Conservancy. We have expressed our objections to the proposed project and the effort to establish new oil production sites in the Los Cerritos Wetlands. One of these properties is public and is managed by the LCWA. We argue here that the agreement (“land swap”) between the LCWA and BOMP involves state environmental protection agencies in oil extraction and conveys our public property to BOMP for the sole purpose of the construction of a new oil extraction facility. We find that this agreement violates the mandates of these environmental protection agencies as described in their charters.

To grant the proposed Amendment to the LCP, will undo the legal protections LCWA property now enjoys under current law and remove any opportunity to restore it to a natural state. Ironically the LCWA property “Don’s 5 acres,” was acquired by the LCWA as the result of a settlement won by Don May/ Earth Corps against Southern California Edison for pollution from its San Onofre Nuclear facility. The LCWLT and LCWA Wetlands Restoration Plans both show the property as a visitors center, and suggest a land bridge from the property to the active wetlands across the street. Regardless of the present stance of these organizations, the public has the right to insist that our LCWA property, not become a new oil drilling facility. This site has not been previously used for oil drilling or production and cannot be considered merely an expansion of current oil operations. It was conveyed to the LCWA for the purpose of wetlands restoration and regardless of current convoluted arguments to the contrary, fossil fuel extraction is not wetlands restoration.

We ask that the Coastal Commission reject the proposed Amendment to Long Beach’s LCP as a violation of both the intent and the letter of Coastal Act. Our comments regarding “substantial issue(s) for each geographic area are as follows:

CHAPTER 3 - Coastal Resources Planning and Management Policies ARTICLE 7 - Industrial Development Section 30260.

30260. Coastal-dependent industrial facilities shall be encouraged to locate or expand **within existing sites** and shall be permitted reasonable long-term growth where consistent with this division. However, where new or expanded coastal- dependent industrial facilities cannot feasibly be accommodated consistent with other policies of this division, they may nonetheless be permitted in accordance with this section and Sections 30261 and 30262 if **(1) alternative locations are infeasible or more environmentally damaging; (2) to do otherwise would adversely affect the public welfare;** and (3) adverse environmental effects are mitigated to the maximum extent feasible.

The city is requesting to establish new oil production facilities on new sites. New and expanded coastal-dependent industrial facilities, including oil production facilities can be accommodated within existing sites throughout Long Beach. Alternative locations for oil production facilities are both feasible and less environmentally damaging than either the LCWA or Pumpkin Patch site. To locate oil extraction and production facilities on these sites will adversely affect the public welfare and adverse environmental effects cannot feasibly be mitigated.

30262. (a) Oil and gas development shall be permitted in accordance with Section 30260, if the following conditions are met:

(1) The development is performed safely and consistent with the geologic conditions of the well site.

The geologic conditions of both the LCWA and Pumpkin Patch include their locations along the Newport Inglewood Fault, their proximity to wetlands and ESHA habitat, to the San Gabriel River and to areas subject to liquefaction and submergence due to sea rise. Additionally, should directional drilling and new pipelines connected these sites be allowed, “the well site” could extend across the both the wetlands and the fault and extend in all directions for up to 7 miles from each drilling platform. The extraction of oil from these proposed well sites cannot be performed safely.

(2) New or expanded facilities related to that development are consolidated, to the maximum extent feasible and legally permissible, unless consolidation will have adverse environmental consequences and will not significantly reduce the number of producing wells, support facilities, or sites required to produce the reservoir economically and with minimal environmental impacts.

The addition of the Pumpkin Patch and the LCWA sites does not include any “consolidation” of existing oil operations for 40 years. The term itself, like “produced water” is misleading. While surface wells may be sealed, the area from which oil is extracted is not reduced but greatly expanded. The “produced” water is wastewater from water flooding, possibly fracking operations, that must, in this case, be re-injected to prevent subsidence. The adverse environmental consequences include increased seismic activity, contamination of groundwater, wetlands, waterways, and beaches due to spills and leaks, Air pollution due to increased production and processing activities. Permanent destruction of Least Tern nesting site. Disruption and destruction of wildlife habitat. Damage to sacred sites within a Tribal Traditional Cultural Property.

(5) The development will not cause or contribute to subsidence hazards unless it is determined that adequate measures will be undertaken to prevent damage from that subsidence.

Drilling for oil in Long Beach can be assumed to contribute to subsidence hazards. Efforts to adequately address the consequences are ongoing. Should the injection of billions of gallons of “produced water” accompany “consolidated” oil operations as is projected for these new sites, new seismic hazards will include toxic brews forced under the Los Cerritos Wetlands and surrounding areas, contaminating, and destabilizing, and forever altering the geology and water table.

(6) With respect to new facilities, all oilfield brines are re-injected into oil-producing zones unless the Division of Oil, Gas, and Geothermal Resources of the Department of Conservation determines to do so would adversely affect production of the reservoirs and unless injection into other subsurface zones will reduce environmental risks. Exceptions to re-injections will be granted consistent with the Ocean Waters Discharge Plan of the State Water Resources Control Board and where adequate provision is made for the elimination of petroleum odors and water quality problems.

The location of the re-injection of oil field brines (“produced water”) cannot be predicted at this point. In fact no information as to the depth and/or breadth of oil drilling operations proposed from either new site are known to Beach Oil Minerals Partners. Re-injection can be assumed to extend beyond current oil-producing zones. Water quality problems as stated above are massive and cannot be eliminated.

(iii) Subparagraphs (A) and (B) shall apply only to new or expanded oil extraction operations. New extraction operations means production of offshore oil from leases that did not exist or had never produced oil, as of January 1, 2003, or from platforms, drilling island, subsea

completions, or onshore drilling sites, that did not exist as of January 1, 2003. Expanded oil extraction means an increase in the geographic extent of existing leases or units, including lease boundary adjustments, or an increase in the number of well heads, on or after January 1, 2003.

The LCWA and Pumpkin Patch sites are not part of existing leases or units existing as of January 1, 2003. They are new sites and new oil extraction operations have been proposed for each.

30263. (a) New or expanded refineries or petrochemical facilities not otherwise consistent with the provisions of this division shall be permitted if (1) alternative locations are not feasible or are more environmentally damaging; (2) adverse environmental effects are mitigated to the maximum extent feasible; (3) it is found that not permitting such development would adversely affect the public welfare; (4) the facility is not located in a highly scenic or seismically hazardous area, on any of the Channel Islands, or within or contiguous to environmentally sensitive areas; and (5) the facility is sited so as to provide a sufficient buffer area to minimize adverse impacts on surrounding property.

The location of **new** oil facilities on **new** sites, the Pumpkin Patch and LCWA properties violate (4) above. These properties are located in a seismically hazardous area, a few hundred feet from the Alta Prieto Fault Zone. Additionally, the Pumpkin Patch property includes and is contiguous with ESHA. The sole purpose of Amending the LCP/SEADIP is “to conform to” (the City’s language in the SEASP FEIR) the Los Cerritos Wetlands Restoration and Oil Consolidation Project. In addition to drilling platforms and rigs, storage tanks, a methane burn off tower on these sites, a pipeline will run between them over the fault and across ESHA habitat.

30240 (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

New industrial/oil production and extraction on the LCWA and Pumpkin Patch sites is not compatible with ESHA and will cause significant disruption of habitat values. “Consolidation” and “restoration” can be misleading and suspect terminology when associated with the expansion of oil production sites and facilities.

30244. Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, **reasonable mitigation measures** shall be required.

There are no “reasonable mitigation measures” with regards to Amending the LCP to allow oil drilling and processing operations on the LCWA and Pumpkin Patch sites. A burial was unearthed across PCH from the Pumpkin Patch. These sites are within a Traditional Tribal Cultural Landscape most of which has not been unearthed and on which ceremony and other tribal activities take place.

30230. Marine resources shall be maintained, enhanced, and, where feasible, restored. **Special protection shall be given to areas and species of special biological or economic significance.** Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

30231. The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, **minimizing adverse effects of waste water discharges** and entrainment, controlling runoff, **preventing depletion of ground water supplies** and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

30232. **Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.**

30230, 30231, 30232 Make it clear that protection of existing marine resources, ground water, and waterways is paramount. While restoration is desirable it cannot be at the expense of the above marine resources, nor can it entail risks to the above marine resources. Amending the LCP to allow new oil operations to be sited on the LCWA and Pumpkin Patch properties will endanger existing marine resources on and adjacent to these properties, throughout the Los Cerritos Wetlands, and beyond. The sole purpose of the Amendment to the LCP is to alter the manner in which oil is being currently being extracted. Horizontal drilling for shale oil deposits entails the use of billions of gallons of groundwater, the pollution of this water, and the discharge of this same wastewater. “Preventing depletion of”, “minimizing adverse effects,” effective containment and cleanup facilities,”

protection against spillage,” are meant to imply that oil extraction can be done in a manner that will not impact existing marine resources. This has not been the case in Long Beach, in the Los Cerritos Wetlands, and elsewhere. “Modern” methods of “enhanced” drilling (again, the sole rationale for Amending the LCP to allow oil extraction operations on the LCWA and Pumpkin Patch properties) are expanding and wreaking havoc across the globe. The ultimate costs to public health and the environment are catastrophic. It is clear that the great wealth to be gained by a few has made our most treasured natural resources, including our California Coast, ground zero for the unlimited extraction of fossil fuels. The Coastal Commission has now mandated that LCPs include plans relative to global warming and sea rise. Allowing new sites for new oil production facilities on the LCWA and Pumpkin Patch in order “get there first with the biggest straw” (John McKeown, Beach Oil Mineral Partners) undermines this goal and should be rejected.

Please also review the following attachments (including a powerpoint!) to better understand our opposition to both the requested Amendments to SEADIP and the Los Cerritos Wetlands Restoration and Oil Consolidation Project. Thanks.

From: Angela Mooney D'Arcy Sent: Monday, September 19, 2016 1:20 PM

To: Craig Chalfant

Subject: DEIR for SEADP is Inadequate Due to lack of tribal consultation

Dear Craig Chalfant, Senior Planner, Long Beach Development Services, The DEIR for SEADP is inadequate and should be rejected due to lack of consultation with affected California Native American tribes, including tribal groups with cultural and spiritual connections to the area. Additionally the fact that a letter sent by Rebecca Robles, representing the United Coalition to Preserve Panhe, clearly requesting participation in the DEIR, was ignored. Both the Cultural Resources section of the DEIR and the archaeological report, contain summaries of Rebecca Robles' letter which are totally false. Tribal nations should have been consulted under CEQA and SB 18. Finally, the DEIR for SEADP should be rejected because it will result in the destruction of both cultural and biological resources of the area which includes the Los Cerritos Wetlands, eligible for Tribal Cultural Landscape status and for listing on the National Register of Historic Places as well.

Sincerely, Angela Mooney D'Arcy Executive Director, Sacred Places Institute for Indigenous Peoples

From: Rebecca Robles Sent: Monday, September 19, 2016 4:38 PM

To: Craig Chalfant Subject: Fwd: Long Beach Southeast Area Specific Plan 2 doc Rebecca Robles United Coalition to Protect Panhe (UCPP) 119 Avenida San Fernando San Clemente, CA 92672

September 19, 2016

Mr. Craig Chalfant The Draft Environmental Report for SEADIP is inadequate and should be rejected by the City of Long Beach for the following reasons. 1. This zoning change requires compliance with SB 18 and formal consultation with Native Americans has not been conducted. We request that the City of Long Beach contact the tribal entities provided by the Native American Heritage Commission and begin consultation in accordance with SB 18 ASAP. 2. The project area has not been systematically surveyed or studied for cultural resources. Most of the studies predate 2000 and few of these studies are applicable today for compliance with CEQA and local guidelines. According to the Cultural Resources Overview, less than 50% of the project area has been surveyed and most of these surveys would need to be upgraded. Of the 45 prehistoric archaeological sites that have been recorded within the proposed project area, 14 are known to be destroyed by development. It is probable that most of the other recorded sites have been destroyed also. 3. The recommended mitigation measures for significant prehistoric archaeological resources do not take into consideration Native American concerns as they call

for monitoring, testing, and data recovery, but there are no recommendations for avoidance and preservation. 4. Over Over 90% of coastal archaeological sites in southern California have been destroyed by development. This represents significant spiritual and cultural losses for Native American descendants. It is time that our spiritual and cultural values are given the consideration and respect they deserve.

Sincerely, Rebecca Robles

Anthony Morales, letter regarding Banning Ranch

February 24, 2016

Rob Wood
Native American Heritage Commission

Regarding: Sacred Lands Inventory

Dear Rob,

We believe that sites ORA-845, 846, 839 and 906 represent one large and significant village site. The individual site numbers represent artificial separations due to oil field development and the outdated archaeological method of looking at each site independent of each other. A burial was found at ORA-839 during WPA archaeological excavations in the 1930s. The majority of this large village site has not been excavated. Based on our tribal traditions, we believe that many more burials are present. This belief is also supported by the proximity to and similarity with the Bolsa Chica sites where numerous burials were discovered. In addition, the large habitation site and the associated camp and special collection sites are part of a large complex of villages that stretch from the mouth of the Santa Ana River upstream to the Gabrielino political center and sacred village of Genga.

The Banning Ranch sites represent the activities that the ancestors carried out centuries ago and are named in our oral traditions and songs, including artifacts, plant gathering areas, and natural features of the landscape that have spiritual meaning. As such they hold great significance for Gabrieleno descendants as a sacred power area, a place where they could gather to honor the ancestors and gain spiritual renewal. The fact that many of the sites have been disturbed does not diminish the area's spiritual significance as the place of our ancestors.

Respectfully yours,
Anthony Morales
Tribal Chairman
Gabrielino Tongva San Gabriel Band of Mission Indians

To: The San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy

Dear Chairman and Members of the Board,

My name is Gloria Arrelanes and I am an Elder of the Tongva whose tribal territory includes the Los Cerritos Wetlands. Unfortunately, I have not met any of you, and, unfortunately, I personally cannot come before you and speak directly to you due to health problems. I send this message to you, to the LCWA, and to the Long Beach City Council.

All due respect to my Ancestors of these lands, especially those who have been disturbed and/or removed from their place of burial in the name of development. It is sad and disappointing to see how development destroys our pristine waters, marine environment, and wildlife. The ports choke us with the smell of oil and the toxic heaviness of fossil fuels. Oil spills are so prevalent and so threatening to birds and other small animals. The wetlands provide for very specific ways of life that have been here as long as the ancient people, the first people, of this land.

While we cannot change or undo what has been done, I am requesting that each one of you use the power of your office to not allow oil drilling on, under or adjacent to the Los Cerritos Wetlands. Please follow your conscience and protect the citizens that you are mandated to protect and represent. Say no to the Los Cerritos Wetlands Restoration and Oil Consolidation Project. To say yes means to risk a potential disaster of oil spills or worse, should there be an earthquake on the Newport Inglewood fault which runs through the Los Cerritos Wetlands. California has had enough disasters.



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Native American Saga, Part 2: So Many Bones, So Little Time

MATT COKER (HTTPS://WWW.OCWEEKLY.COM/AUTHOR/MCOKER/) DECEMBER 15, 2008 — [LEAVE A COMMENT](#)
(HTTPS://WWW.OCWEEKLY.COM/NATIVE-AMERICAN-SAGA-PART-2-SO-MANY-BONES-SO-LITTLE-TIME-6478034/#RESPOND)

“Next is another fun item,” joked Chairman **Bill Mungary** as the **California Native American Heritage Commission** (<http://www.nahc.ca.gov/>) (NAHC) moved on to the controversy surrounding remains (<http://blogs.ocweekly.com/navelgazing/a-clockwork-orange/state-panel-backs-native-ameri-1/>) unearthed on the mesa above the Bolsa Chica wetlands after a lengthy debate over the treatment of buried remains at **Mission San Juan Capistrano**.

The commission, meeting Friday in the San Juan Capistrano City Council chambers, is empowered by state resources laws to protect Native American remains, gravesites and cultural resources.

Nearly three hours, late into the night, was spent solely on Bolsa Chica, where **Brightwater/Hearthside Homes** two years ago unearthed hundreds of teeth, jawbones and other bone fragments that are now held in 5,500 bags. Under a coastal development permit, those remains must be reburied near the spots they were taken by Native American monitors “in a timely manner.”

The NAHC and California Coastal Commission, which issued the development permit, agree two years and counting is not a timely manner and have told Brightwater officials as much. The NAHC also voted Friday night to send letters to the **City of Huntington Beach** and the **County of Orange** expressing concern over past and future handling of remains at Bolsa Chica—and indicated they will explore legal action if their concerns are not addressed.

In his staff report to the NAHC, their program analyst **Dave Singleton** accused Hearthsides officials of displaying a “lack of cooperation” and new Orange County Sheriff **Sandra Hutchens** of displaying a “lack of communication” as the commission tries to sort out what is going on at Bolsa Chica. The county Coroner's Office, which must be notified when remains are discovered, reports to Hutchens.

“This is an example of cultural catastrophe,” said **Anthony Rivera**, who represents one faction from the **Juaneño-Acjachemen** group of mission Indians whose ancestors are buried on the mesa. “There are bones and bones and bones.”

]

Rivera said he and other Juaneños have not been informed when remains have been found and reburied, having to rely on newspaper accounts. “The tribe protests tremendously what happened here. ... We want the reports, we want involvement and at the very least we want to be informed.”

His ire was directed not just at developers and public officials but Indians who are paid to monitor development sites as most likely descendants (MLDs) of effected tribes. But the next speaker at the podium was a MLD at the Brightwater site, **Anthony Morales** of the **Gabrielino-Tongva** people, who also have ancestors buried on the mesa. Morales looked over at Rivera and said, "I wish he would have called me. I am very surprised he did not know about it."

Larry Myers, executive secretary of the NAHC, noted that Hearthside Vice President **Ed Mountford** contends that it is disagreement among different MLDs and tribespeople about how to handle remains that is responsible for his company's delay in not turning them over. Morales called that "a bunch of lies," saying he and **David Belardes**, the longtime MLD for Juaneños at Brightwater and several other contentious Orange County development sites, are in agreement about sorting through the 5,500 bags before re-burying the remains.

The Native Americans want to sort through the remains so attempts can be made to bunch together the bone fragments of individual people before they are reburied. Adrian Morales of the Gabrielino-Tongva contends those bones were together as intended in the ground before the developer's tractors ground them up and spread them all over.

"We need closure," Anthony Morales pleaded to commissioners.

Belardes noted that Mountford, who was not present, has said Hearthside cannot afford the cost of sorting through all the bags and reburials so the Native Americans have to choose one or the other. "Even in a good year, developers cry, 'We don't have any money,'" said Belardes, who has 30 years of experience working with Bolsa Chica developers.

Indeed, some locals accuse Belardes of having sold out his heritage in exchange for paychecks as the MLD for hire among developers. They further criticize him for not informing other members of the tribes when remains are found, of conducting reburials in secret and of keeping artifacts.

"There is a problem within the Indian community itself, a sickness that allows this to happen," said **Paul Moreno**, who was among the 20 Native Americans who joined the Bolsa Chica Land Trust in the unsuccessful attempt to convince the Coastal Commission last month to yank development permits until the remains issue can be settled. Moreno said local Juaneños had to learn from an internal

Hearthside memo that 87 remains had been unearthed during one dig. “I don't know why the MLD did not come to the Juaneño community and say we have something here,” said Moreno.

Chris Lobo, who is aligned with Rivera, agreed: “We've got a bad situation in our community.” He said his generation of Indians is now trying to “deal with the messes of the past.”

Some commissioners obviously had their suspicions about Belardes as well. After the San Juan Capistrano resident gave a rundown of the dozens and dozens of remains that have been unearthed during different points in development on the mesa, Commissioner **Jill Sherman** was dumbfounded. “I don't understand [why], when you found the first bone, you didn't stop [development],” she said.

It was not like the finds would have surprised local Native Americans, who've always known from stories passed down in their families that the mesa was a village and cemetery for their ancient ancestors.

However, Belardes blamed the heat he's received locally on elders such as himself clashing with “new Indians” or “new kids on the block,” complaining, “The new Indians don't give you the respect.”

Later, as Lobo walked by, Belardes offered his own version of respect: “What are you? One of these 1/16ths or 1/32nds?”—referring to the percentage of Native American blood that runs through Lobo's veins.

Moreno said the time has come to look beyond internal disagreements. “It's about honoring the ancestors. That's it.” He called the commission “the hope for a lot of us. I don't think this is a joking matter. This is serious stuff.”

Mungary, saying he was heartened to hear that from a young person, informed the crowd of 70 people gathered in the chambers that the NAHC had voted earlier in the meeting to take a hard look at how MLDs are chosen.

Paul Arms, president of the **Bolsa Chica Land Trust**, gave the NAHC more to think about, asking for help on behalf of his 5,000 members. The nonprofit group was formed in 1992 specifically to preserve the Bolsa Chica wetlands, which an earlier incarnation of Hearthside Homes wanted to turn into a marina surrounded

by more than 3,000 homes. The Land Trust and state Parks Department eventually bought the nature preserve for \$85 million from the developer but has continued to fight development of the mesa above the wetlands.

Arms apologized for not having fought more vigorously for that final 300 acres of land, which is incrementally being developed into exclusive neighborhoods. Noting that the Land Trust hosts thousands of schoolchildren at the nature preserve every school year, Arms said, "We don't want to tell kids the Native American culture got paved over but a mallard duck was saved."

Arms also scoffed at the notion that Hearthside is too poor to sort, pointing to the \$85 million paid for the wetlands and estimated \$200 million taxpayers have dedicated to the area since this development was first proposed there. "The level of criminality going on at Bolsa Chica for years is astounding," he told commissioners. "I look at the toll road, I look at San Juan Capistrano, I look at Bolsa Chica, and I see the same people. I see the same people fighting the developers, and I see the same people siding with the developers. I'd like to see us write a new history for Bolsa Chica."

As part of that new history, he offered the possibility of suing once again to stop development, something he said could be successful if the commission joined the effort. "Help fix this ongoing crime," he said.

Believe it or not, the commission agreed to look into that.

The most emotional testimony of the night was given by **Ruben Aguirre**, a Gabrielino-Tongva who moved to Southern California from Missouri. "What I can't understand is why Native American people are always treated as secondary people, especially when it deals with reburials."

He often had to fight back tears while speaking.

"To let this developer do as they please, these people do not have a heart. I can say that they are not spiritual people. It's all about greed and money. They do not care about our sacred lands ... remains, artifacts, in burials that are dug up. It's like native people are not here anymore. We're gone. We're extinct.

“The government did a good job on us. So when they find one of us, we're an artifact. They'll send us to a museum. . . . All I know is there are more dead Native Americans in universities than live ones, that I can say.”

Aguirre wondered how developers, university officials and museum directors would like it if their ancestors were dug up and displayed as artifacts.

“From east to west to north and south we fight, but it happens to all of us, all Native Americans when it comes to burials. It's nothing to them. . . . Or I'm the monitor and I get paid. What's wrong with you? You are no different than the developer. Our ancestors are in bags, waiting and waiting for us. . . . It breaks my heart. I cry and cry and I pray.”

Mungary, clearly moved, said this country needs people like Aguirre to speak like that to lawmakers in Sacramento and Washington, D.C., so laws can be strengthened on behalf of the NAHC.

Patricia Martz, an anthropology professor and California Cultural Resources Preservation Alliance advocate who has worked with local Juaneños for years to preserve the mesa, told the commission about a six-acre parcel adjacent to the disputed Brightwater site that the city of Huntington Beach is annexing while 23 future homes are planned there. Surmising there must be remains buried on that site as well, Martz predicted “we'll be back again next year, crying over the same thing.”

Commissioners later voted to investigate that six-acre plot for possible protection.

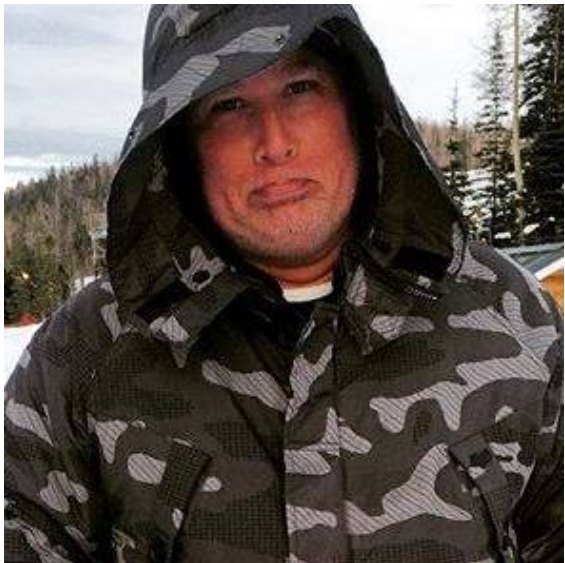
As for the entire Hearthside site, Commissioner **Laura Miranda** could not believe it was not brought to her agency's attention earlier. “There is a bigger issue here: The commission in 2006 should have tried to stop this project from being built,” she said.

Not that they would have remembered.

“Didn't we talk about this very issue at UCLA?” Sherman asked.

“That was Playa Vista,” answered Commissioner **James Ramos**.

So many bones, so little time.

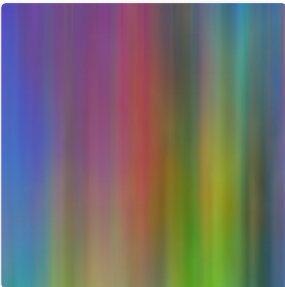


Matt Coker
(<https://www.ocweekly.com/author/mcoker/>)

Matt Coker has been engaging, enraging and entertaining readers of newspapers, magazines and websites for decades. He spent the first 13 years of his career in journalism at daily newspapers before “graduating” to OC Weekly in 1995 as the paper’s first calendar editor. He went on to be managing editor, executive editor and is now senior staff writer.

 (<http://www.twitter.com/MatthewTCoker>)

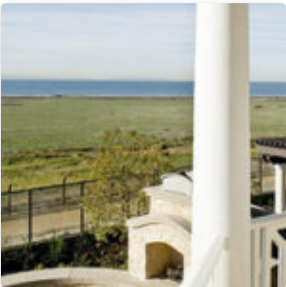
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In Culver City, people power scores a victory over big oil

Blog: [News](#)

Date: Tuesday, June 26, 2018 Author: By Monica Embrey

An oil field in Inglewood, Calif. Credit: L.A. County

Southern California has long been the toxic playground of the oil extraction industry, but a growing movement of grassroots activism across the region is organizing to change that. Just last week, community members in Culver City successfully lobbied their city council to commission a study on how to phase out the oil field in their backyard. This monumental vote is a testament to the power of communities fighting back against the interests of corporate polluters that threaten their health and safety. It is especially significant because it marks a shift in direction for Culver City, which before this vote was planning to approve regulations to expand dangerous neighborhood oil drilling.

Los Angeles isn't just palm trees and Hollywood stars -- shockingly, millions of people in Los Angeles live directly adjacent to oil extraction operations. There are 68 active oil fields in Los Angeles County with thousands of drill sites located in densely populated urban neighborhoods adjacent to homes, schools, daycares, parks, hospitals, and other places people live, work, play, and study. Some people live as close as three feet away from the boundary of drill sites and as close as 3 feet away from the boundary of drill sites and as close as 60 feet from active oil wells and oil workers in hazmat suits.

In addition to being a major contributor to greenhouse gas emissions that drive global climate change, neighborhood oil drilling exposes Los Angeles residents to toxic chemicals and smog-forming gases. These result in a host of health issues for neighboring communities as they are exposed to benzene, toluene, ethylbenzene, xylenes (BTEX) and other compounds known as #thedirtydozen. Many of these toxins are known to cause respiratory illness, cardiovascular disease, leukemia, lymphoma, lung cancer, nervous system damage, reproductive and endocrine disruption, and premature death. Neighbors to urban oil drilling suffer disproportionately from these health impacts.

The Sierra Club Angeles Chapter's Clean Break Committee. Credit: Sierra Club

Urban oil drilling in Los Angeles is truly an environmental justice crisis with the most devastating threats impacting the most vulnerable families. Many of the communities most affected by neighborhood oil wells have high concentrations of people of color and low income households. A 2014 study by Liberty Hill found that of the over 120,000 people who live within 1,500 feet of an active oil well in LA City, 74.4% were people of color and 42.3% were 200% below the poverty level. Many neighborhoods with urban oil drilling operations have already been identified as high risk in cumulative impact screenings because of their exposure to environmental hazards and pollution.

Oil field operators are hoping to continue to expand their operations in Los Angeles, despite these devastating impacts. But empowered communities are raising their voices to put an end to this dirty and dangerous practice.

A growing movement is calling for an end to urban oil extraction and with their demand: "No drilling where we're living." Activists across Los Angeles County are organizing their communities to come

together and demand their local government leaders phase out neighborhood oil drilling.

In Culver City, a town of 40,000 people in the western part of Los Angeles County, the Sierra Club's [Clean Break Committee](#) has been actively organizing our members for years alongside allied organizations to call for more stringent regulation of the Inglewood Oil Field, the largest urban oil field in the United States.

Activists packed the Culver City meeting. Credit: Ben Golof

In the city of Los Angeles, an environmental justice coalition called Stand Together Against Neighborhood Oil Drilling in Los Angeles, or [STAND-LA](#), has formed to represent neighborhoods that are facing urban oil drilling. The coalition is calling on the Los Angeles City Council to pass a 2,500-foot human health and safety buffer to protect Angelenos from drilling in their backyards. Sierra Club is a proud supporter and ally of STAND-LA.

The recent vote to change course on oil field regulation in Culver City is evidence of the growing power and momentum of the push to make oil drilling in Los Angeles a thing of the past. More than one million people live within five miles of the Inglewood Oil Field, with about 10% of the oil field lying within the borders of Culver City. Due to public outcry over the health, safety, and environmental concerns when noxious fumes leaked from the oil field in late 2005, Culver City City Council began a process to oversee more robust regulation of the Inglewood Oil Field. In fall 2017, the city proposed a [draft plan](#) with recommendations that included allowing expanded drilling, including almost doubling the number of well sites in the next 15 years.

The draft plan sparked massive protest. Community members submitted over 1,000 public comments, testified to the city council, and packed in public meetings to demand that the city develop stronger regulations. They also got to work engaging in the city council elections, and in April 2018, two strong environmental champions that were [endorsed by the Sierra Club](#) were [elected](#) to Culver City City Council.

Last week, more than 120 community members packed in the Culver City Council Chambers for a [community meeting](#) on the planning process. Dozens of community members testified, calling on the city to protect the community's health and environment and supporting a subcommittee proposal to commission a study on how to phase out drilling. The only speaker who testified in favor of expanded drilling was a representative for the oil operator, and during her statement, community members held up green signs that read "No Drilling Where We're Living" and "Culver City Deserves Health and Safety" in opposition.

The 5 member council voted unanimously in support of the subcommittee recommendations and the [crowd erupted in applause and cheers](#). The Sierra Club and our members will continue to support and engage the Culver City City Council on this effort to ensure that the residents in Culver City and all across LA County are not being exposed to toxic oil drilling.

The Clean Break Committee sent a clear message: No drilling where we're living! Credit: Monica Embrey

Culver City sent a strong message about the direction for oil drilling in LA, and demonstrated how years of organizing to end neighborhood drilling is gaining power. Now, instead of fighting against expanding oil operations, the community can begin to envision a healthy, sustainable, and safe beneficial use for that area.

It's time for elected leaders in the City of Los Angeles, Los Angeles County, and the entire state of California to take a lesson from Culver City and take meaningful action for a healthy climate and communities. No drilling where we're living!

Monica Embrey is Senior Campaign Representative for the Sierra Club's Beyond Dirty Fuels Campaign.

CURIOUS COAST

LA's Tongva descendants: 'We originated here'

JUL 17, 2018 By [Jenny Hamel](#)

Julia Bogany, a Tongva tribal elder. Photo by Jenny Hamel

KCRW listener Araceli Argueta wanted to know more about the history of Los Angeles' indigenous people and submitted this question to Curious Coast. "What Native Tribes' lands are we on? Are there living descendants? What is their story?"

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[Tongva descendants work to keep their culture alive](#)

Kuruvungna Springs flows on a small nature preserve near Santa Monica. It's a sacred spot to the Tongva, one of LA's indigenous tribes. The name – Kuruvungna – means "a place where we are in the sun" and it was the name of a Tongva village that once sat at this site of this natural spring.

Today, the Gabrielino Tongva Springs Foundation leases the land from the Los Angeles Unified School District and invites people to learn more about indigenous culture, tradition and history.

This is where I met Julia Bogany, a Tongva tribal elder, educator and the Cultural Affairs officer for the Gabrielino/Tongva Band of Mission Indians. She says sitting along the spring, which flows under the shade of a 150 year old Mexican Cypress, makes her think of what life was like for her ancestors.

"The water is flowing cool. It's really nice. It's a nice place to be in the middle of the city. There's peace and quiet," said Bogany about Kuruvungna Springs. "As for ceremonies, it's really important because we don't have those places where we can go for our own ceremonies, but here we can."

The Tongva have been in Southern California for at least 10 thousand years, according to archeologists. Some Tongva descendants, like Craig Torres, say they've been here since the beginning of time.

"Now the name Tongva comes from a word in our language which means the earth or the land or one's landscape, so it translates to 'people of the earth,'" said Torres, a Tongva educator. "In our stories, we originated here, we didn't come from any land bridge we get where this is where we are from."



Kuruvungna Springs flows under a 150 year old Mexican Cypress, a Tongva village once sat at this site. On the other side of the fence, University High School's football field. (Photo: Jenny Hamel)

The Tongva lived all throughout the Los Angeles Basin down to north Orange County and on Catalina and San Clemente islands. Tongva villages were often built near rivers, creeks, and other sources of water. Their biggest village was called Yangna and it sat right where downtown LA sits today, near the Los Angeles River. The Tongva traded extensively between themselves and with other tribes- like the Chumash, their neighbors to the North and West. Torres said a major reason they thrived, was that they had a relationship with the natural land based on a deep respect.

"There is this reciprocity that is needed in any type of relationship we have, whether it's human or animal planet whatever. It's a give and take. And that's how my ancestors were able to survive on this land for not a few hundred years, but for thousands of generations," said Torres. "And that's why it looked the way it did when the Spanish first came up here and they noted it in their diaries it was like a paradise."

When the Spanish arrived in Southern California in the late 1700s, life as the Tongva knew it was over. From that point on, the history of the Tongva and of all indigenous people in California, is an incredibly painful one – wrought with stories of mass killing, stolen land and stolen identity.

The Spanish settlers arrived and built the Mission San Gabriel in 1781. Thousands of Tongva were forced to leave their villages to work and live in the Missions. The missionaries collectively called all natives “Gabrielinos.”

The Tongva and other tribes were baptised, forced to give up their language and their culture.

The tribes fought back fiercely. But as bad as things were under the Spanish, the slaughter only increased when California became a state in 1850.

“It was worse when California was taken over by the Americans because there were actually mandates on the extermination of California Indians,” said Torres. “And that was probably one of the worst times for our people.”

The state of California finally recognized the Gabrielino-Tongva under state law in 1994. The tribe never received federal recognition or assistance.

“I think if the United States just acknowledged that there is a history of the people that were here. I don't see recognition in my lifetime... I'll be 70 next month” said Julia Bogany, tribal elder. “But I do see an acknowledgement of the people and I think it's happening slowly. I think it's happening slowly as colleges and the San Gabriel Mission are saying ‘These were the first people.’”

Roughly two thousand Tongva descendants live in Los Angeles today and some of our local cities have names that originated with the Tongva.

“If you notice they're all in the foothills of the San Gabriel mountains Rancho Cucamonga, Azusa, Pacoima, Tujunga- and that comes from the word ‘tohu’ which is like an elder woman or an esteemed elderly woman in the community,” said Torres.



Craig Torres, a Tongva educator, standing in front of an elderberry tree, every part of which- from the berries to the branches- were valuable to his Tongva ancestors. (Photo: Jenny Hamel)

For Torres, keeping Tongva culture alive means educating today's Angelenos, young and old, about the earth and treating it with respect and reverence as his ancestors did.

"For me part of bringing healing back to our communities," said Torres, "is educating people that live here that they really should be paying attention and adhering to those ancient instructions that we were given you know thousands and thousands of years ago by our ancestors on how to conduct ourselves on the land. Because all the kids, you know, we all have different mothers but we only share one mother earth and we don't get another one."

Both Torres and Bogany have worked with UCLA on education projects, including a website called "[Mapping Indigenous LA](#)," which is dedicated to the diversity of Los Angeles and is platform for the Tongva and other communities to tell their own story.

Bogany's role as an educator includes teaching her great-granddaughter about the Tongva culture and language. Bogany says the 11-year-old is proud to be a Tongva descendant.

"I always say the Tongva women never left their land. They became invisible," said Bogany. "We're not invisible anymore."

Notes on Los Cerritos Wetlands/Hellman Ranch/Mola - contact for Seal Beach records

In the 1880s, when the Hellman family took control of the property, the wetlands at the end of the San Gabriel River spanned thousands of acres. But a century has transformed the land into a weed-choked, 196-acre triangle pocked with oil pumps, power lines and crippled fragments of severely degraded wetlands. A history of the Hellman Ranch:

1922: First oil pumps installed. Wetlands filled to make roads for oil trucks.

1930-34: U.S. Army Corps of Engineers dumps tons of dirt on the property during rerouting and channeling of San Gabriel River. Marsh recedes as canals are built to control water.

1961-63: More fill and dredge dumped on property during construction of power-plant cooling channel. Dumping continues into the mid-1970s.

January 1982: California Department of Fish and Game finds 23 of remaining 25 acres of wetlands on the property are "severely degraded."

1986: Mola Development Corp. proposes 773-unit residential development.

1986-89: Mola's proposal stirs controversy during public hearings. Council approves plan for 355 homes in October 1989.

January 1990: Coastal Commission grants Mola permit to build 329 homes and restore 36.8 acres of wetlands.

March 1990: Judge rescinds City Council approval of Mola project because city's housing plan is outdated.

May 1990: Residents filibuster council meeting to ensure pro-Mola majority will not get final say on development.

June 1990: New council overturns earlier approval of Mola project. Mola sues and vows to put issue to citywide vote.

June 1991: Seal Beach voters reject Mola's well-financed bid for ballot approval.

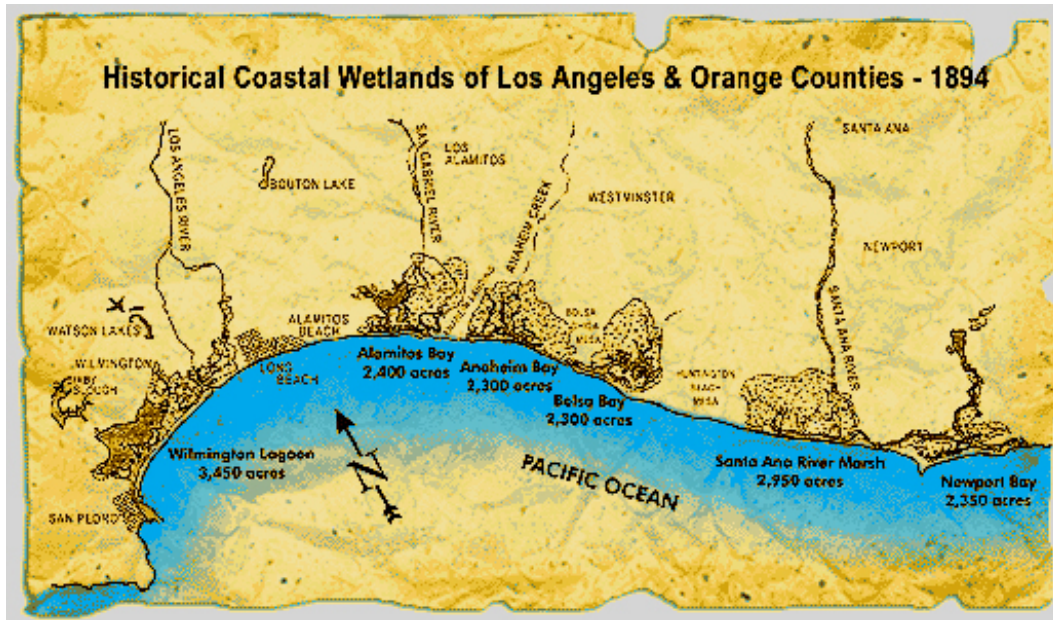
Notes on Los Cerritos Wetlands/Hellman Ranch/Mola - contact for Seal Beach records

November 1996: City officials scrap proposal for detailed study of archeological significance of several sites on property.

Executive Assistance Part-Time, Winnie Bell

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[http://](http://www.stockteam.com/wetlands.html)

www.stockteam.com/wetlands.html

Over 8,000 years ago, [Native American Indians](#) lived on bluffs overlooking these wetlands. As early as 6,000 B.C., it is believed that Hokan speaking aboriginal tribes occupied the [coastal region around Huntington Beach](#). Much has changed since then. In the more recent past, Southern California once counted 53,000 acres of wetland areas. It is down to 13,000 acres now. Progress and growth has taken its toll to the tune of a 91% loss of wetlands in California, more than any other state. Many migratory birds are dependent on the remaining wetlands, with 20% of North America's migratory birds using the Pacific Flyway. Birds wintering in California's wetlands have declined from 60 million to 2 million, largely because of destruction of this habitat. Over the past decade, there has been a 30% decline in the commercial landings of fish that depend on wetlands in California. There was once a very active and productive fishing industry in Los Angeles and Orange counties, but today it is almost non-existent. This is largely due to the loss of most of our coastal wetlands.

Landscape refers both to a way of viewing the environment surrounding us and to this environment itself. The appeal of the idea of landscape is that it unifies the factors at work in our relationship with the surrounding environment. Landscapes, whether of value or not, provide the setting for our daily lives; they are familiar and the concept of landscape links people to nature, recognizing their interaction with the environment. The very notion of landscape is highly cultural, and it may seem redundant to speak of cultural landscapes; but the describing term 'cultural' has been added to express the human interaction with the environment and the presence of tangible and intangible cultural values in the landscape. The human geographers define a cultural landscape as "a concrete and characteristic product of the interplay between a given human community, embodying certain cultural preferences and potentials, and a particular set of natural circumstances. It is a heritage of many eras of natural evolution and of many generations of human effort." (Wagner and Miskell, quoted in Fowler, 1999, p.56). Each people has a specific relation, physical and associative, with its environment, which is ingrained in its culture,

its language, its livelihood, its sense of being and its identity, which is inseparable from its relationship with the land. The physical relation and the symbolic relation influence each other. They will not be the same in forest, in prairies, in desert or in ice fields. They are also influenced by many other factors, related to the history of each people, its relations with its neighbours, its social structure. In hunter-gatherer cultures of Africa, the Pacific, the Americas or the Arctic region, the symbolic and physical or the Arctic region, the symbolic and physical relation to the land is inseparable from their religious beliefs and their cosmogony: human beings are an element of nature, among others, and natural features bear many associative values, now described in terms of cultural landscapes.

Places may have several cultural values at once. A place can be important for social, scientific, historical and aesthetic reasons, or any other combination of values, depending on the features and the layers of history and associations attached to these features.

Places do not have to contain physical remains to be important. For example, places with high aesthetic, social, religious or symbolic values may not have visible signs of occupation, but nonetheless are significant for the response they evoke in people, or for the associations that people might have with them. This is the case for indigenous people with landscape features. Documenting associative values of traditional people with landscapes is now well recognized...under the revised criteria describing cultural landscapes – “justifiable by virtue of the powerful religious, artistic or cultural associations of the natural element rather than the material cultural evidence, which may be insignificant or even absent.”

An understanding of landscape’s significance is the foundation for its management and the basis for developing a shared vision (or mission) statement that represents the landscape values and the perspectives of all key stakeholders. Unless there is a shared understanding of why the landscape is important and what makes it so, it is very difficult to obtain agreement on management policies.

Assess the opportunities and challenges, pressures, or threats faced in realizing the vision and management objectives. Challenges refer to any process that if allowed to continue unchecked may over time degrade the values and condition of the landscape and its features. Identifying and documenting challenges to a landscape also assesses the vulnerability of the resources and associated values in a very visible and transparent manner. This is also preparation for identifying an appropriate management response(s) for protecting the values of the landscape.

The traditional landscape is characterized by bush or waterside flora, woodland or open pasture, arable land, distinctive field shapes and patterns, particular management regimes like irrigation and hunting, and/or the use of local materials in vernacular buildings.

Impacts of development on cultural landscapes

In most countries, State or regional land use planning laws exist, which include provision for preparing environmental impact assessments for new facilities or developments in the landscape. The process of environmental impact assessment consists of several stages; value assessment, vulnerability assessment and impact assessment. Cultural heritage must be acknowledged in all of these in order to find an acceptable solution. This means that goals not only for the development of project but also for the development of cultural values should be discussed at an

early stage. Alternatives that use the heritage value as a resource should be taken into consideration.

US Guidelines for the Treatment of Historic Landscapes (1994): Protection, Stabilization, Preservation, Rehabilitation, Restoration, Reconstruction.

http://www.ramsar.org/sites/default/files/documents/library/cop10_culture_group_e.pdf

The Convention on Wetlands was signed in 1971 in the Iranian city of Ramsar, as a multilateral agreement focusing on wetland ecosystems and especially the waterbirds associated with them. The text states: "...Being convinced that wetlands constitute a resource of great economic, cultural, scientific and recreational value, the loss of which would be irreparable....."

A growing body of evidence supports the recognition of links between biological and cultural diversity and continued exploration of the interface between these and other forms of diversity. The role of indigenous peoples, both as custodians of biodiversity and proponents of cultural diversity, is crucial in understanding the interconnectedness of these issues. Conservation of nature is at the heart of the cultures and values of many indigenous peoples. For more than 300 million indigenous people, the Earth offers not only life, but also the basis of their cultural and spiritual identities. Because their world-view holds that the Earth and its resources are inherited from the ancestors, the Earth and its resources are a sacred heritage....Cultural heritage also includes religious heritage, and spirituality can have effects beyond simply appreciating nature, through, inter alia, custodianship of sacred forests and sacred groves⁴.

Not surprisingly, conservation biologists and wildlife managers tend to focus on biological issues when addressing conservation of 'natural areas', but the achievement of conservation outcomes requires an understanding of people and their aspirations and an awareness of the political and social climate³.

Human survival and wetlands

Wetlands have provided valuable resources and sanctuaries for human populations and many other life forms since the very beginning of life on Earth. Major civilisations have been established in association with them and in dependence on their resources, especially the resource of water. Human activities of some sort and to some degree of intensity have existed in the majority of the wetlands of the world. The abandonment of traditional activities of the primary resource use sector in many countries during much of the 20th century reduced the perceived importance of some wetlands as a direct resource base for human survival. On the other hand, many of their other values to people have begun to be better understood and appreciated. These include a regulatory role in the water cycle, flood abatement, aquifer recharge, processing of nutrients and pollutants, shore protection, food provision, and educational and recreational opportunities. It is only natural, therefore, that water has been venerated in many religions and the 'blessing of the waters' has been a common ritual. Wetlands in turn, as a major source of water, have been similarly respected in these traditions. Thus, the values of the wetlands, and especially their cultural values, have been inextricably linked with human survival. Yet, in spite of all conservation and 'wise use' efforts, wetland destruction has continued in many parts of the world, in developed and developing countries alike. At the same time, the appreciation of wetland values has led to significant projects for the restoration of lost or heavily degraded wetlands, usually at much greater cost than their initial conservation would

have entailed. The experience from these projects has shown how very difficult it is to restore to any degree the values and ecological functions of destroyed or degraded wetlands. It has also demonstrated that it is practically impossible to restore, once lost, their previous cultural and historical values. It should be stressed therefore that the loss of wetlands does not only remove important resources, but also causes profound social damage to human communities.

Since through the ages many human settlements have been located in or close to wetlands, significant archaeological remains are found today within them or in their vicinity. A particular interest of wetlands from the archaeological point of view is that they preserve records of human activities through the ages, which are not so well preserved in other environments. It should not be forgotten, however, that cultural values are not only associated with the past (either remote or recent), but also with the present, as culture evolves and is being created, in one form or another, on a continuous basis. Use of the word 'heritage' in some language translations can be misleading in this respect, and in English it should be understood as including 'living heritage' and the legacy or inheritance for future generations, as well as historical heritage. At the cultural level, wetlands and water should be treated in an integrated manner, as their inextricable anthropic linkages have existed since early civilisations and are still pertinent today. It is reasonable, therefore, to consider wetlands and water as one domain when assessing or promoting relevant cultural aspects.

O.1.3.1 – To take carefully into account and protect ancient sites and structures (archaeological heritage) in, or closely associated with, wetlands

Six actions are suggested for achieving the above objective: a) recognise ancient sites in the proximity of wetlands and collect information on their history, extent and significance from bibliographic sources and from responsible services and experts; b) incorporate these sites in the management plans of the neighbouring wetlands; c) ascertain whether the ancient sites can be incorporated in wetland visitor programmes

O.4.3.1 – To encourage co-operation between wetland managers and the custodians of sacred natural sites (new) To achieve co-operation, the following actions are proposed: a) recognise officially the sacred character of specific natural elements and the inherent rights associated with them; b) invite the custodians of sacred natural sites to participate in the preparation, approval and implementation of management plans for relevant protected areas; c) invite these custodians to participate in an equitable manner in the management bodies of these protected areas; and d) establish consultation mechanisms among the different sides in order to resolve amicably emerging issues of conflicting land uses and practices. Beliefs and mythology, in particular creation myths, may also have a strong significance for the conservation of wetlands, in particular those in, or related to, sacred sites.

O.4.3.3 – To take into account wetland-related spiritual belief systems and mythologies in efforts to conserve wetlands (replaces guiding principle 18) The following actions may be required: a) study in detail for each religion, belief and mythological system its links with nature, water and wetland resources, drawing on the active participation of religious institutions and leaders, and the custodians and practitioners of the belief and mythological systems in indigenous and local communities; b) use this knowledge to present the conservation and sustainable use message in appropriate forms; and c) work with churches and/or religious leaders and appropriate members

of indigenous and local communities so as to encourage them to convey these messages and to participate actively in the efforts for environmental conservation as an integral part of respectful management of the Creation.

<http://tongvapeople.com/villages.html>

The Gabrielino-Tongva Tribe, a California Indian Tribe is historically known as San Gabriel Band of Mission Indians. The Official Site can be found at <http://www.gabrielinotribe.org>

Wetlands of the Los Angeles Basin

Many Tongva-Gabrielino villages existed in the wetlands where the river meets the sea. A wetland is an area of land whose soil is saturated with moisture either permanently or seasonally. Such areas may also be covered partially or completely by shallow pools of water. Wetlands include swamps, marshes, and bogs, among others. The water found in wetlands can be saltwater, freshwater, or brackish. see: Ballona Wetlands see: Bolsa Chica Ecological Reserve

Tongva Village sites - Long Beach to Newport Beach

Ahwaanga

Ahwaanga was a coastal village located near the Los Angeles River and within the city boundaries of Long Beach. http://en.wikipedia.org/wiki/Long_Beach,_California

Amaunga A village located near Bixby Knolls and Long Beach.

Bolsa Chica Ecological Reserve is a nature reserve in the city of Huntington Beach, California, The history of Bolsa Chica is a long and varied one. The earliest peoples were the Tongva Indians of California. Archaeologists have found cog stones which date back 8,000 years and are the only surviving relic of the Indian lifestyle. Their exact purpose is unknown, but speculation has centered on religious or astronomical use. Cog stones can be seen at the Bowers Museum in Santa Ana. http://en.wikipedia.org/wiki/Bolsa_Chica_Ecological_Reserve

Kengaa A coastal village near Newport Beach, CA

Kenyaanga A coastal village located near Newport Beach, CA. Name Variations or Other Villages:-Kenyaangna

Lopuuknga The village was located near Costa Mesa and the Santa Ana River.

Lukupangna A village located near the mouth of the Santa Ana River/Huntington Beach. Name Variations or Other Villages:-Lukup-Lukup

Long Beach, California Indigenous people have lived in coastal southern California for at least ten thousand years. Over the centuries, several successive cultures inhabited the present-day area of Long Beach. By the time Spanish explorers arrived in the 16th century, the dominant group were the Tongva people. They had at least three major settlements within the present day city boundaries. Tevaaxa'anga was an inland settlement near the Los Angeles River, while Ahwaanga and Povuu'nga were coastal villages. Along with other Tongva villages, they were forced to relocate in the mid 1800s due to missionization, political change, and a drastic drop in population from exposure to European diseases. http://en.wikipedia.org/wiki/Long_Beach,_California The

Tongva people had at least three major settlements in Long Beach: **Tevaaxa'anga** was an inland settlement near the Los Angeles River, while **Ahwaanga** and **Povuu'nga** were coastal villages. CA.

Los Angeles County Gabrielino villages existed throughout the Los Angeles Basin. When Cabrillo arrived in 1542 in San Pedro Bay, he called the land the "Bay of Smokes" because he saw so many village fires inland.

Motuucheyngna Mutuucheynga A Tongva village located in the Seal Beach area of Long Beach

Povuunga Povuunga The village was located near Long Beach and the San Gabriel River. (Alamitos) a coastal village located near the Los Angeles River http://en.wikipedia.org/wiki/Long_Beach,_California Name Variations -Povunga- Puvungna - Long Beach/Alamitos-

Shwaanga The village was located in Long Beach, CA. Name Variations or Other Villages: Swaanga Suangna A village located near Palos Verdes and Long Beach. Name Variations or Other Villages: -Shuavit -Suagna -Suangna Soabit

Tibahanga A village near Lakewood and Bixby Knolls. (Cerritos) Name Variations or Other Villages:-Tibahagna Tibaha

Protect the Long Beach/Los Cerritos Wetlands

Protect the Long Beach/Los Cerritos Wetlands is a coalition of individuals and organizations formed to oppose the Los Cerritos Wetlands Restoration and Oil Consolidation Project. Our immediate goal is to stop the extraction of 200 million barrels of oil from beneath the Los Cerritos Wetlands. The Los Cerritos Wetlands Restoration and Oil Consolidation Project puts public safety and the environment at risk. 120 new wells will be drilled immediately adjacent to the Newport Inglewood Fault, new pipelines will transport oil over the fault, and oil and wastewater will be stored and processed on site. Beach Oil Mineral Partners expanded oil operation will introduce dangerous slant drilling and water injection methods to extract oil and to re-inject wastewater under the wetlands and surrounding areas. BOMP's wetlands "restoration", funded by selling pollution credits, will introduce toxic soil and water into our healthy salt marsh.

Tongva and Acjachemen tribal nations, environmentalists, and community members have been struggling to protect and preserve the Los Cerritos Wetlands for decades. These wetlands, at the mouth of the San Gabriel River on the east side of Long Beach, were once a vast estuary that supported the large Tongva community of Puvungna. Due to flood control measures, oil drilling, industrial, commercial, and residential development much has been lost, and what remains (the best salt marsh in Southern California) is now under assault from Beach Oil Mineral Partners and those public and private entities supporting their project.

Our group Facebook page has @ 500 members and is the primary way that we communicate information, including our petition drive, upcoming community events, meetings, and actions. Our public outreach has included attending and speaking at meetings of the LCWA, the Long Beach Planning Commission, the Long Beach City Council, the Seal Beach City Council, the San Gabriel and Lower Los Angeles Rivers and

Mountains Conservancy, the California Coastal Commission, and meetings of local neighborhood associations and activist organizations. We have also met with individual Long Beach City Council members/staff and Congressman Alan Lowenthal's staff.

We have held a rally and prayer vigil on the wetlands, have run information tables at local farmers markets and numerous community events, and have participated in numerous marches and rallies including the Women's Marches and rallies opposed to offshore oil drilling in Laguna Beach and in Sacramento. Additionally we have been corresponding with local and state agencies and other organizations and individuals in regards to both gathering and disseminating information.

We testified in opposition to the Los Cerritos Wetlands Restoration and Oil Consolidation Project at hearings of the Long Beach Planning Commission and appealed the project's approval to the Long Beach City Council. Our appeal was denied and the project was approved. We are now preparing to oppose approval of the the project by the California Coastal Commission and other permitting agencies. Additionally we continue to question certain aspects of the process, including the involvement of state environmental protection agencies, as well as activities, such as pesticide spraying, currently taking place in the wetlands.

Protect the Long Beach/Los Cerritos Wetlands

We have a Board of Directors (composed of our most active members) that functions as the decision making body. We also have an Advisory Board (of members and supporters) that can provide additional input and outreach as needed. We hold meetings open to all interested parties but do not, as of yet, have a regularly scheduled time and place to gather.

Member Organizations (individuals not listed here) United Coalition to Protect Panhe
California Cultural Resources Preservation Alliance

Sacred Places Institute for Indigenous Peoples
Red Earth Defense
Long Beach Area Peace Network Stop Fracking Long Beach
Sierra Club, Long Beach Chapter
SoCal 350 Climate Action
The Environmental 99%
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Tuesday, January 16, 2018

Dear Members of the Long Beach City Council,

When considering the appeals of the Planning Commission's decision to approve the project's FEIR, LCP, and other permits before you tonight, we would ask that council members reflect on the complexity of this plan and the extent to which both the council and the community, your constituents, fully grasp the risks it poses to public safety, the marine environment, air and water quality and tribal cultural resources. We ask that you uphold the appeals brought by Protect the Long Beach/Los Cerritos Wetlands and Citizens About Responsible Planning and reject the Planning Commission decision to approve the FEIR. If you conclude that you are not prepared to uphold these appeals and to reject the project FEIR as inadequate at this time, we ask that council move to hold a study session and to postpone a vote on the appeals and the project FEIR and other permits for at least 30 days. The City Attorney Charles Parkin has confirmed that it is well within your right to do so.

California Coastal Commission staff stated that "to characterize the proposed project as a wetlands restoration project, first, and a *relocation* of oil extraction and processing equipment, second, is a misrepresentation of the overall project and could be misleading to the public. The impetus behind the development of the proposed project was the updating and more importantly, the *expansion* of oil extraction and processing operations at the Synergy Oil Field." Coastal Commission staff lists the following potential coastal act issues: siting of hazardous industrial development, seismic and subsidence hazards, soil and groundwater contamination, oil spills and other hazardous materials, water and air quality, greenhouse gas emissions, noise and visual impacts, recreation and public access, cultural resources, wetlands and other environmentally sensitive habitats, emergency services and other public services.

The proponents claim the FEIR has adequately described and addressed all significant environmental impacts and states that the project will cause no environmental impact that cannot be mitigated. Calif Coastal Commission staff, environmental and tribal organizations, and community members have responded that the project proponents have failed to prove their case, citing numerous false conclusions and a lack of evidence supporting their arguments. Given the chasm of disparity between the project proponents and all of the above, serious questions concerning both what is and isn't addressed in the FEIR, remain unanswered. Your decision making power allows local control over projects created by commercial interests to benefit their global corporate investors. The well being and future of people and places in our town depend on your getting it right.

Sincerely,

Protect the Long Beach/Los Cerritos Wetlands

Coalition About Responsible Government

Long Beach Area Peace Network

Stop Fracking Long Beach

California Cultural Resource Preservation Alliance

United Coalition to Protect Panhe

Sacred Places Institute for Indigenous Peoples

Red Earth Defense

Sierra Club

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The 'Big One' will be deadlier than thought: A massive earthquake could plunge large parts of California into the sea INSTANTLY

- The discovery was made after studying the Newport-Inglewood fault
- Major earthquakes on the fault centuries ago caused areas to sink 3ft
- Today that could result in the area ending up at or below sea level
- Scientists believe the 'Big One' is now overdue to hit California

By [REUTERS](#) and [PHOEBE WESTON FOR MAILONLINE](#)

PUBLISHED: 19:13 EDT, 21 March 2017 | **UPDATED:** 19:41 EDT, 22 March 2017

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The Big One may be overdue to hit [California](#), but scientists near LA have found a new risk for the area during a major earthquake.

They claim that if a major tremor hits the area, it could plunge large parts of California into the sea almost instantly.

The discovery was made after studying the Newport-Inglewood fault, which has long been believed to be one of Southern California's danger zones.

The fault runs under densely populated areas, from the Westside of Los Angeles to the Orange County coast.

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© US Geological Survey

A view of the San Andreas fault in the Carrizo Plain. Scientists from California State University Fullerton and the United States Geological Survey found evidence the older quakes have caused the land to fall by three feet

Major earthquakes on the fault centuries ago caused a parts of Seal Beach near the Orange County coast to sink 3ft in just seconds.

In total three quakes over the last 2,000 years on nearby faults made ground just outside Los Angeles city limits sink as much as 3ft.

Today that could result in the area ending up at or below sea level, said Cal State Fullerton professor Matt Kirby, who worked with the paper's lead author, graduate student Robert Leeper.

The study showed that land within major Californian seismic faults could sink by 1.5 and three feet instantly.

The last known major quake occurred on the San Andreas fault in 1857.

Seismologists estimate the 800 mile-long San Andreas, which runs most of the length of the state, should see a large quake roughly every 150 years.

'It's something that would happen relatively instantaneously,' Kirby said.

'Probably today if it happened, you would see seawater rushing in.'

The study was limited to a roughly two-square-mile area inside the Seal Beach National Wildlife Refuge, near the Newport-Inglewood and Rose Canyon faults.

Kirby acknowledged that the exact frequency of events on the faults is unclear, as is the risk that another quake will occur in the near future.

WHAT IT MEANS

An event along the same lines of the historic earthquakes, which were most commonly around a magnitude 7.5, could cause the land to shift by an average of 9 feet.

The official USGS forecast for California earthquakes now predicts a 16 percent chance of an M7.5 quake or larger on this section of the fault within the next 30 years.

And, a rare but more powerful quake like the 1857 event could shake the ground for up to three minutes, displacing the land by 20 feet.

This could have devastating effects, with potential to damage the aqueducts that bring water into Southern California, disrupt electric transmission lines, and tear up Interstate 5, according to the **LA Times**.



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▶ Happy lady! Kevin Hart's wife smiles as she shows off pregnant belly during gym run... after actor's mistress offers to help nail sex tape blackmailer

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Ben Affleck's girlfriend Lindsay Shookus steps out in New York... after actor 'is spotted at outpatient center in Los

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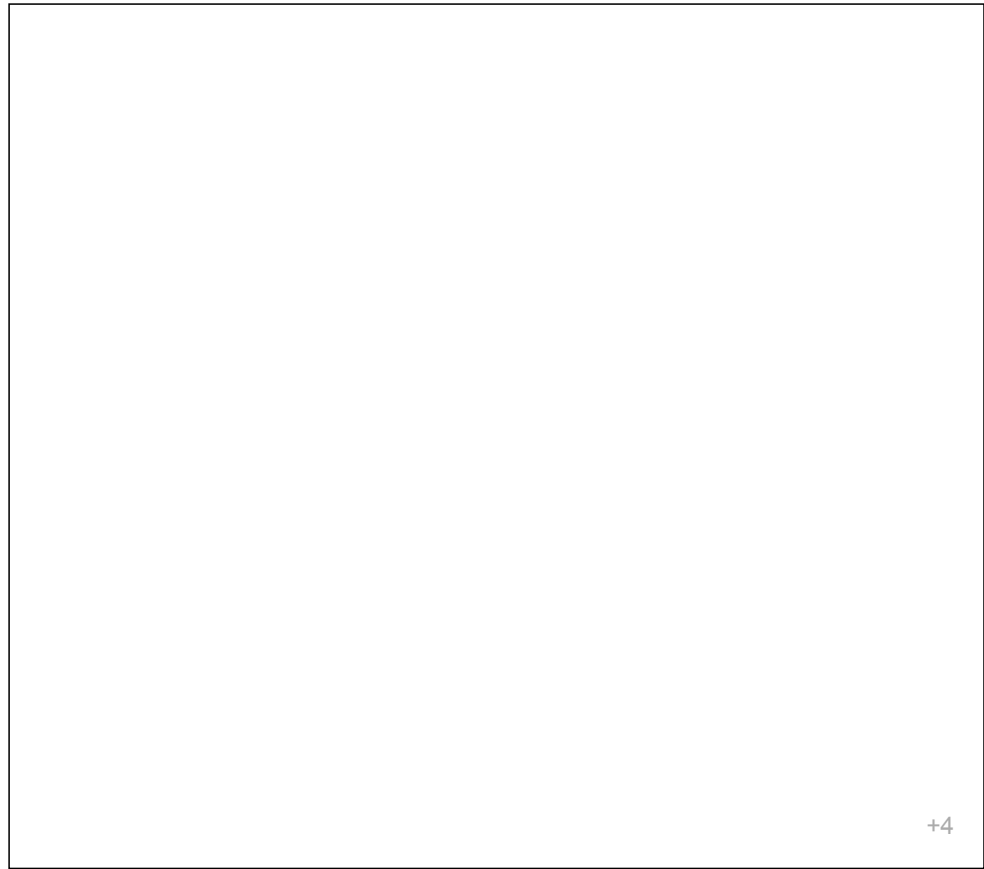
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The study was limited to a roughly two-square-mile area inside the Seal Beach National Wildlife Refuge, near the Newport-Inglewood and Rose Canyon faults

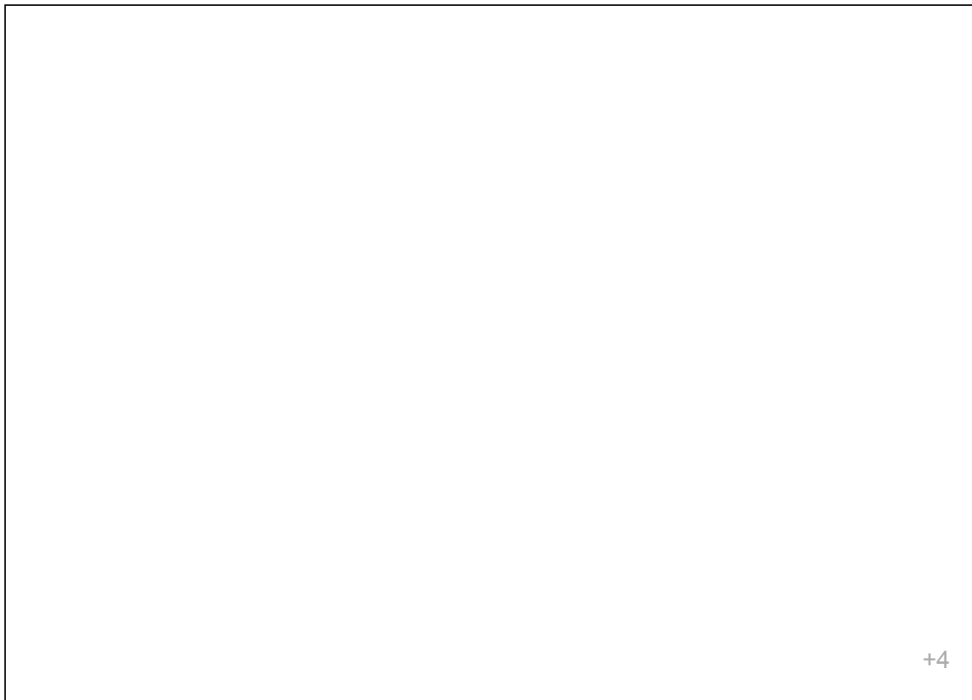
The smallest of the historic earthquakes was likely more intense than the strongest on record in the area, the magnitude 6.3 Long Beach earthquake of 1933, which killed 120 people and caused the inflation-adjusted equivalent of nearly a billion dollars in damage.

Today, the survey site is sandwiched by the cities of Huntington Beach and Long Beach, home to over 600,000 people.

Nearby Los Angeles County has a population of 10 million.

- Angeles to treat alcohol addiction'
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- 'Another matching outfit': Kendall Jenner shares sweet throwback photo with sister Kylie... amid news her younger sibling is pregnant Used to dress like twins

EXCLUSIVE: OJ accuses Ron Goldman's



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The official USGS forecast for California earthquakes now predicts a 16 percent chance of an M7.5 quake or larger on this section of the fault within the next 30 years. Shown here is the chance of an earthquake across California over the next 30 years

CALIFORNIA AT RISK OF DEVASTATING MEGAQUAKE

A report from the U.S. Geological Survey has warned the risk of 'the big one' hitting California has increased dramatically.

Researchers analysed the latest data from the state's complex system of active geological faults, as well as new methods for translating these data into earthquake likelihoods.

The estimate for the likelihood that California will experience a magnitude 8 or larger earthquake in the next 30 years has increased from about 4.7% to about 7.0%, they say.

Scientists: Chances of mega-quake hitting California rising



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► All in place! Elizabeth Banks is caught checking her cleavage in plunging top while wearing pink wig to shoot The Happytime Murders in LA

► Vanessa Paradis, 44, commands attention in monochrome ensemble as she attends the FIFF film festival with boyfriend Samuel Benchetrit

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► Back into Daredevil shape! Jennifer Garner, 45, works out hard in gym as she prepares for new action role after difficult Ben Affleck divorce



'We are fortunate that seismic activity in California has been relatively low over the past century,' said Tom Jordan, Director of the Southern California Earthquake Center and a co-author of the study.

'But we know that tectonic forces are continually tightening the springs of the San Andreas fault system, making big quakes inevitable.'



Seismologist John Vidale, head of the University of Washington-based Pacific Northwest Seismic Network, said after reviewing the study he was skeptical such powerful quakes could occur very frequently in the area.

Kirby noted that the team could only collect soil core samples within the relatively undisturbed refuge.

He said that taking deeper samples would shed light on the seismic record even further back, potentially giving scientists more examples of similar quakes to work from.

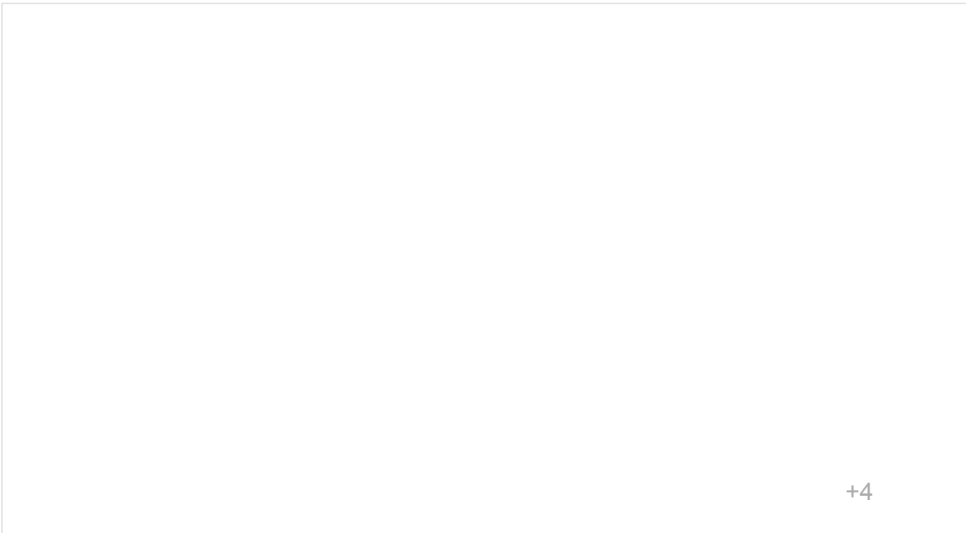
PLANS FOR 'THE BIG ONE'

Federal, state and military officials have been working together to draft plans to be followed when the 'Big One' happens.

These contingency plans reflect deep anxiety about the potential gravity of the looming disaster: upward of 14,000 people dead in the worst-case scenarios, 30,000 injured, thousands left homeless and the region's economy setback for years, if not decades.

As a response, what planners envision is a deployment of civilian and military personnel and equipment that would eclipse the response to any natural disaster that has occurred so far in the US.

- ▶ Nicole Richie looks chic in a fringed dress as she steps out after dad Lionel admitted he is 'scared to death' about Sofia, 19, dating Scott Disick, 34
- ▶ A bright fuchsia! Elizabeth Hurley, 52, looks ageless in a hot pink blouse as she promotes Breast Cancer Awareness in Los Angeles
- ▶ YouTube star Logan Paul reveals he once 'lost 15% of his testicle' while shooting a viral video with friends
Viral video maker was on Jimmy Kimmel Live
- ▶ Screen legend Grace Kelly's granddaughter Camille, 19, stuns with her resemblance to the princess (but that cigarette isn't very regal)
- ▶ 'I have anxiety, are you sure it's safe here?': Kim Kardashian sobs in Mexico as she experiences PTSD from Paris robbery as seen in KUWTK teaser
- ▶ 'Hot Felon' Jeremy Meeks files for divorce from wife Melissa after eight years of marriage as his romance with heiress Chloe Green heats up
- ▶ On the run! Rita Ora flashes her washboard abs in a sports bra and leggings as she holds tissues to her head while rushing out of NYC hotel
- ▶ New mom Carey Mulligan vows at premiere of her new movie Mudbound... after welcoming second child with husband Marcus Mumford
- ▶ 'I am massaging the pink into the little pixie's hair': Michelle Williams holds glass of wine as she gets her platinum locks dyed by 'drunk' Busy Philipps
- ▶ Donald asked me if he should Tweet says Ivana - and she reveals Trump phones for advice every week but she didn't want hard work of being his ambassador



This haunting photograph shows people walking through rubble in San Francisco on 18 April 1906. Many people are worried that the city and LA, for example, would look like this again due to a massive quake

Should you drink a daily dose of gluten-free soy sauce like Victoria Beckham? Nutritionists

[▶ give their verdicts](#)

Loves using Bragg Liquid Aminos

There would be waves of cargo planes, helicopters and ships, as well as tens of thousands of soldiers, emergency officials, mortuary teams, police officers, firefighters, engineers, medical personnel and other specialists.

'The response will be orders of magnitude larger than Hurricane Katrina or Super Storm Sandy,' said Lt. Col. Clayton Braun of the Washington State Army National Guard.



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▶ 'Such sadness at your loss': Lisa Vanderpump announces death of her beloved pooch Pikachu... just days after the passing of her Pomeranian Pink Dog

▶ She's one lucky blonde! Kit Harington leaves fan overwhelmed as he stops for a chat before exchanging a selfie for a cigarette with another bystander

▶ Hannah Jeter shows off her post-baby body in Daisy Dukes as she house-hunts in Miami after husband Derek is named new co-owner of the Marlins

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ABOUT PUVUNGNA

The following background is from the reverse side of our March 12, 1966 flyer.

Background on Puvungna and the Sacred Site Struggle

What Is Puvungna?

Puvungna is the Indian village which once occupied the land where Cal State Long Beach now stands. Puvungna remains sacred to the Gabrielino and other Indian people as a spiritual center from which their lawgiver and god -- Chungichnish -- instructed his people.

Ethnohistoric evidence clearly identifies Puvungna with Rancho Los Alamitos, a portion of which became the Cal State Long Beach campus. More than a dozen archaeological sites spread over an area of about 500 acres on and near our campus have been identified as Puvungna village sites. Most of these have been destroyed by development.

In 1972, campus workmen uncovered portions of an Indian burial on one of these sites, LAn-235, located on the western edge of campus. These remains were placed in our archaeology lab. A few years later, LAn-235 was placed on the National Register of Historic Places to "represent" Puvungna "as a means of perpetuating the memory of these native peoples and their religion, and as an aid to the program of public education." Two other sites were included in the National Register: the adjacent LAn-234 and LAn-306, located just east of campus on the grounds of the historic Rancho Los Alamitos.

In 1979, the human remains were reburied on LAn-234, after a long struggle by Indian students.

In addition to the burial and reburial sites, the area slated for development included about two acres of community garden plots known as the Organic Gardens which were established on the first Earth Day. There is also a large natural area where numerous native birds, mammals, trees, and grasses flourish and where summer day camps for children have been held for many years.

Unfortunately, the tradition of learning and teaching which began with the Indian elders was poorly understood by campus officials. Plans to build a strip mall on the Puvungna site were blocked by the Puvungna Sacred Site Struggle.

What is the Struggle About?

Officials decided to develop the site in 1992. The first phase of development was to replace the Organic Gardens with a temporary parking lot. When the gardeners were told of this, they organized the Committee to Save the Organic Gardens. Students and residents joined the movement and gathered thousands of signatures on petitions to save the Organic Gardens, using slogans such as "Save It, Don't Pave It!" and "Let My People Grow!"

Officials turned a deaf ear to community protests and filed a Negative Declaration as required by state environmental law before the parking lot could be built. The Negative Declaration stated that there were "no cultural resources" on the site.

This is when the compost hit the fan, so to speak. State officials and local Indians objected, pointing out that the site was not only listed on the National Register of Historic Places but also that the University itself had posted a sign near the reburial site which read: "Gabrielino Indians once inhabited this site, Puvungna, birthplace of Chungichnish, law-giver and god."

Frustrated in their attempt to conceal the National Register status of the site, campus officials began to argue that there was insufficient evidence to claim the site was actually Puvungna and announced a "cultural review" to determine through archaeological excavation whether the land was in fact sacred.

Such a dig was opposed not only by the Native American Heritage Commission but also by professional archaeologists. As one archaeologist put it, no amount of digging will come up with a prehistoric sign that says "Welcome to Puvungna!"

Campus officials turned a deaf ear to the concerns of the Indian community and proceeded with plans for a massive archaeological dig which would have involved using a backhoe to dig 20 meter long trenches every 20 meters over the entire site.

When Indians pitched tents and began a prayer vigil to protect the site, campus officials built a fence and ordered them off the site under threat of arrest.

This action prompted the American Civil Liberties Union to enter the case. According to Raleigh Levine of the ACLU: "This case is about the First Amendment rights of the Native Americans to whom Puvungna is sacred. They have the right to freely exercise their beliefs without the state stepping in to pave over their place of worship and put a mini-mall on it."

The ACLU obtained a Preliminary Injunction which blocked any digging for archaeology or development purposes, and ordered that Native Americans be granted access to the land for spiritual purposes. This injunction was to remain in effect until the case could be decided in court. After three years and millions of wasted taxpayers dollars, the legal battle continues.

How Much Has this Cost the Taxpayers?

The bill for Cal State's "Indian Wars" continues to grow. The total acknowledged by campus officials is over \$2.3 million. Much of this comes from the General Fund which is the state allocation from the taxpayers and student fees and is intended to be used for instruction and instructional support.

The Indians, by contrast, are being represented on a pro bono basis by lawyers from the law firm of Strumwasser & Woocher, as well as the ACLU and the Center for Human Rights and Constitutional Law.

Are There Real Indians in Los Angeles?

There are over one hundred thousand Indians in Los Angeles. Like most other Angelenos, most of them have moved here from other states in search of a better life. Many of these Indians also regard Puvungna as sacred land, since "what is sacred to one Indian tribe is sacred to all Indians."

There are also thousands of Gabrielino/Tongva Indians who were the first people of the Los Angeles area. These Indians are survivors of the twin holocausts of the Missions and the Yankee invasion and today live as refugees in the land that once was theirs. Their world of great natural beauty was taken from them so that we would build our world of concrete, subdivisions, freeways, and shopping malls.

Present day Indians are trying to save a small part of what is left of their world. Puvungna was, and is, an important part of their world. Their struggle to save Puvungna deserves the support of all Southern Californians.

Visit the Puvungna Web Site: <http://www.csulb.edu/~eruyle/puvuhome.html>

Ask your school or public library to order the Puvungna video: "Sacred Lands, White Man's Laws." Available for about \$149 from Films for the Humanities & Sciences: (800) 257-5126.

A background packet of newspaper clippings with other information of Puvungna is available. \$10 donation to cover xeroxing and mailing requested, call the PCPC at (310) 985-5364.

Call the Puvungna Hotline for the latest news: (310) 985-4619

The following flyers also provide summary information from earlier periods of our struggle.

[Basic Flyer, November 1993-April 1995](#)

[Save Puvungna! No Mini Mall on Indian Sacred Site at Cal State Long Beach](#)

This was put out as a general information flyer and widely distributed in 1994 and 1995. It had minor updates and editorial changes during this period. This was the period when the CSU appealed the Preliminary Injunction all the way to the California Supreme Court, and lost at every step.

[PCPC News, April 29, 1995](#)

[Puvungna Struggle Continues: Indians vow to appeal unfair court decision . . .](#)

We put this flyer out to let our supporters know about the unfair court decision of April 6.

This document was posted on July 18, 1995

Modified on October 24, 1996

eruyle@csulb.edu

[Return to Main Puvungna Menu](#)

The Community
Consequences of
Expanded Oil
Development in
Los Angeles

DRILLING DOWN



*This publication is dedicated to the memory of Lark Galloway-Gilliam,
founder and executive director of Community Health Councils,
and a fearless leader who devoted her life to the fight for
equality, health and justice for all.*

**The Community
Consequences
of Expanded Oil
Development in
Los Angeles**

DRILLING DOWN



Change. Not Charity.



Ashley Hernandez, Wilmington resident



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An oil drilling site operated by Warren E&P encroaches upon a residential neighborhood in Wilmington.

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INTRODUCTION

Oil drilling operations loom over many residential neighborhoods in Los Angeles.

From South Los Angeles to Baldwin Hills to the Harbor area, neighborhoods throughout Los Angeles are on the frontline of an epic debate about our energy future.

This report shares stories of residents who are living very close to oil drilling and production operations where toxic chemicals and potentially hazardous well stimulation technologies are used to extract oil from the ground.

Mothers, fathers, senior citizens, and students all share their experiences of exacerbated health ailments—including nosebleeds, nausea, respiratory illness, and dizziness—that they believe are associated with oil development operations in their neighborhoods. They detail their growing concerns with disruptive diesel trucks rumbling past their homes, noxious odors, escalating noise levels, and an unsettling fear of the potential for explosions, spills, and other hazardous incidents.

In this report, we also highlight residents' accounts of a fragmented and ineffective regulatory and zoning system. Unresponsive government agencies, local authorities, and energy company public relations have all too often failed to be transparent and provide notification, and have ignored, delayed, or denied that residents' concerns are real and urgent.

While Los Angeles has been a center of oil production for decades, this report reveals that many more people are now living in neighborhoods where years ago oil companies received their drilling permits. Today, we find densely populated urban neighborhoods with homes, schools, daycare centers, and multifamily and senior apartment buildings adjacent to expanding oil and gas operations.

We also find that most of the neighborhoods featured in this report are typical “environmental justice” (EJ) communities where residents already suffer disproportionately from exposure to air toxics that are associated with elevated rates of asthma, respiratory and heart diseases, and cancer than do higher income and majority Anglo neighborhoods. The neighborhoods and corresponding drill sites profiled here include: University Park, Jefferson and Murphy Drill Sites in Historic West Adams, Wilmington and Baldwin Hills.

With ***DRILLING DOWN: The Community Consequences of Expanded Oil Development in Los Angeles***, Liberty Hill Foundation aims to contribute to the current policy debate. Should the City and County of Los Angeles pass moratoriums on enhanced forms of energy production or consider additional health-protective standards, such as distance buffers or prohibitions next to sensitive land uses? How can government create full transparency and accountability to our residents when multiple jurisdictions regulate oil drilling sites? And, with an eye to the future, does Los Angeles want to increase our investment and dependence on dirty, fossil fuel infrastructure—or accelerate our movement toward renewable energy that will improve environmental health, reduce carbon emissions, and increase the potential for a massive expansion of jobs in the fields of energy conservation, energy efficiency, and renewable energy technology?

By highlighting the voices of community residents, our goal is to urge decision makers to move toward a vision that prevents premature death and illness from environmental causes and that supports a healthy, safe, and sustainable Los Angeles.

The neighborhoods at the frontlines—and all Angelenos—deserve such a future.



Michele Prichard

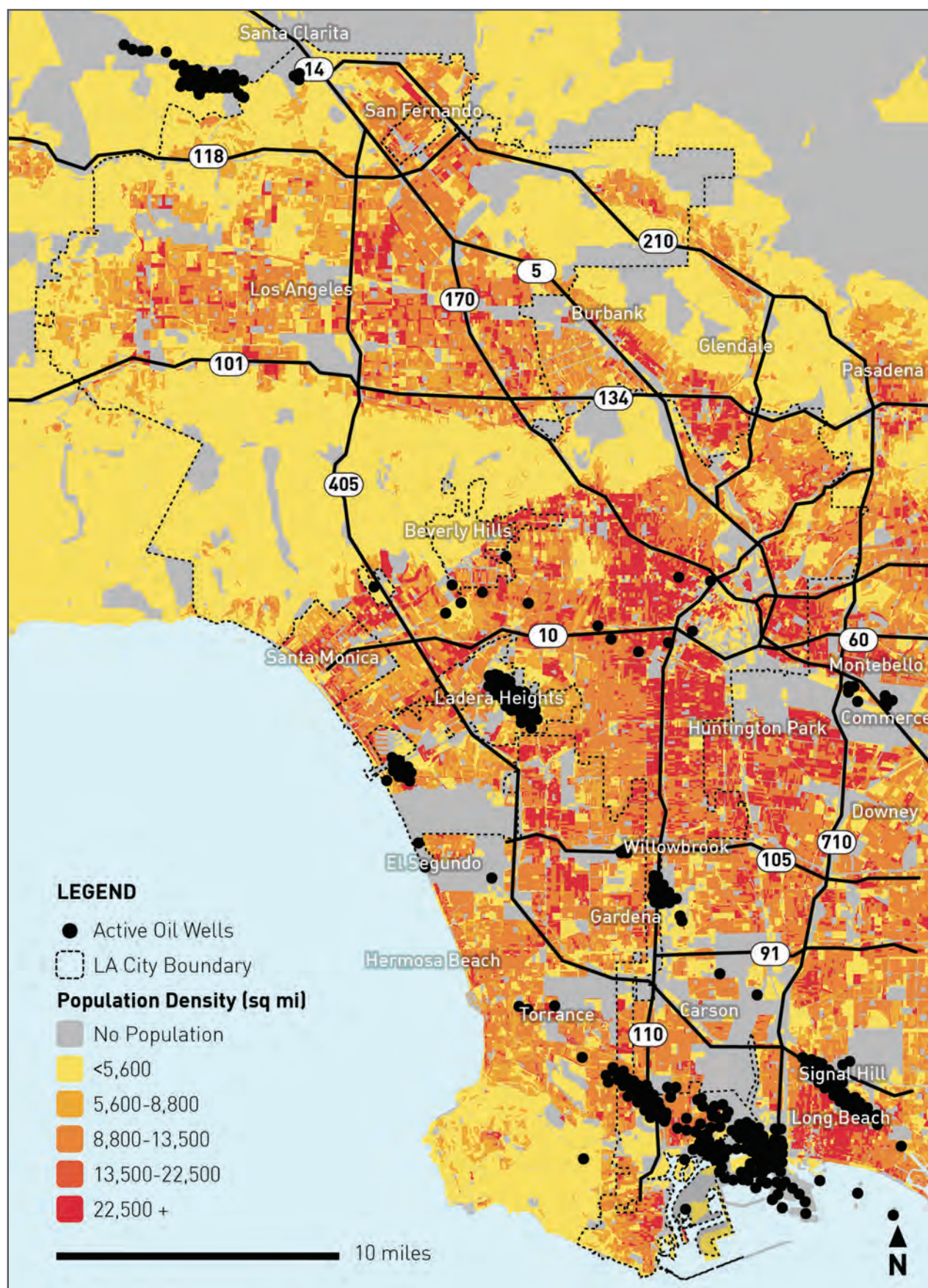
Director, Common Agenda



Daniela Simunovic

*Environmental Health and
Justice Program Manager*

MAP 1: Active Oil Wells in Los Angeles County and their Relationship to Population Density



Many oil wells and fields are located in areas of high population, exposing large numbers of people to the hazards associated with these facilities and their operations.

(Data from 2010 US Census and Department of Oil, Gas, and Geothermal Resources 2014)



OIL EXTRACTION IN LOS ANGELES: HEALTH, LAND USE, AND ENVIRONMENTAL JUSTICE CONSEQUENCES

James Sadd, Ph.D., *Professor, Environmental Science, Occidental College*

Bhavna Shamasunder Ph.D., *Assistant Professor, Urban and Environmental Policy, Occidental College*

Los Angeles is the largest urban oil field in the country. Thousands of active oil wells in the greater Los Angeles area are located near and among a dense population of more than 10 million people. In some cases, oil drilling and production are located disturbingly close to homes, schools, churches, urban parks and playgrounds, and hospitals¹—places where our communities live, work, go to school, and play. These areas are identified as “sensitive land uses” because populations that are biologically sensitive² to air pollution and cancer-causing chemicals—the very young and the elderly, and people with respiratory disease—spend extended time in them each day³. Many active wells are also located within environmental justice neighborhoods, as defined by state law⁴ and identified by the California Environmental Protection Agency (CalEPA). These neighborhoods are characterized by residential populations with high proportions of the poor and unemployed, persons with low educational attainment, a high percentage of non-English speakers, high levels of certain health impacts (low birth-weight infants, asthma), and people who also experience greater exposure to environmental hazards and the attendant health risks, as compared to the general population.

History of Oil Production and Land Use

The juxtaposition of oil production near communities is a consequence of the history of oil exploration and drilling in Los Angeles and poor land use decision-making. Early in its history, Los Angeles was a slowly growing

agricultural region. However, early in the 20th century, three driving forces—the production and use of petroleum, the import and use of water, and a rapidly expanding transportation network—set into motion the growth and change that created the Los Angeles of today. For a brief period in the 1930s, the city was the center of world oil production and the Los Angeles basin was the Saudi Arabia of the day (Tygiel 1996). After the discovery of oil near today's Dodger Stadium at a depth of only 460 feet, discoveries of major oil fields quickly followed at Huntington Beach, Signal Hill (Long Beach), and Santa Fe Springs, as well as many smaller fields with names that define the heart of the city itself: Los Angeles, Union Station, Boyle Heights, Downtown, Las Cienegas, Inglewood, Playa del Rey, Venice, Sawtelle, San Vicente, Rosecrans, and Wilmington. Oil transformed the region's economy and repurposed its growth and development.

For decades, the petroleum industry became the leading sector of the entire state's economy, with California supplying about a quarter of the world's oil and gas. The industry reached its peak in the late 1960s, exporting approximately 133 million barrels of oil per year. An enormous amount of money was quickly made from oil in Los Angeles and spent in extravagant ways. Oil money created family dynasties with names like Getty, Doheny, and Bell; funded huge real estate developments; and made possible the network of roads and highways that ushered in reliance on cars requiring a constant supply of gasoline. Hollywood and the motion picture industry were also significantly financed by the new

¹ These specific land uses have been identified by the California Air Resources Board (CARB 2005).

² Sensitive Populations are defined by the CalEPA to include schools, daycare centers, senior residential facilities, urban parks and playgrounds, and healthcare facilities (CARB 2005).

³ Sensitive Land Uses are defined for purposes of health protection from air pollution by the California Air Resources Board (CARB 2005).

⁴ California Government Code 65040.12e

Almost one quarter of active wells in the city are located on residentially zoned land (mostly multifamily and high density).

oil economy (*New York Times* 2008). In addition to oil, the Los Angeles Aqueduct brought surplus water to the region, and the Los Angeles Flood Control District installed systems to alleviate the region from disastrous and destructive flooding. This allowed the population to increase rapidly, and by the late 1930s, the agricultural economy was completely replaced with residential land, and a manufacturing and commercial economic base. Today, oil wells across the greater Los Angeles area remain very productive, yielding approximately 28 million barrels per year from fields on land as well as offshore.

The Geographic Distribution of Oil Production

The California Division of Oil, Gas, and Geothermal Resources Division (DOGGR) is the primary public agency responsible for oversight of petroleum-related activities, including pollution emissions prevention⁵ and public safety, and it maintains an extensive well inventory that is publically accessible⁶. According to DOGGR, there are well over 24,000 wells in L.A. County, mostly concentrated in about 70 oil fields (Chilingar and Endres 2005). Some 5,194 of these wells are either “new” (356) or “active” (4,838) as of 2014. According to the City of Los Angeles Department of City Planning, the city hosts 1,071 new and active oil wells located in a few specific areas (see Map 1), with the most dense concentrations in established oilfields. About half of the city’s active wells are located in the Wilmington area and most of the rest are in isolated fields in West L.A., South L.A., and Mid-City neighborhoods. Three quarters of the active wells in the city are operated by five companies⁷.

Los Angeles is unusual in that it is a densely populated major city with many active oil production facilities located in close proximity to communities and residences. In some places, oil production takes place just over a fence line or on the same block as homes, schools, and vulnerable populations. Additional oil wells located outside the city boundaries are also in close proximity to residential neighborhoods in Beverly Hills, Baldwin Hills, Inglewood, Marina del Rey, and El Segundo. The oil industry has responded to this proximity and population density by employing horizontal wells and directional drilling, which enables them to access oil over a wide area from a tightly concentrated central facility that is often hidden by fences, hedges, walls, and even camouflage (Center for Land Use Interpretation 2010).

Beyond oil extraction, there is a vast network of facilities supporting the chain of oil production, transport, refining, and distribution. Marine terminals in the Ports of Los Angeles and Long Beach receive and store nearly all of the region’s crude oil, tar sand, and asphalt. Transportation of oil, natural gas, and refined product is concentrated along pipeline routes, along with the network of rail and trucking routes that distribute the product to users. Eleven of the top 20 petroleum refining facilities statewide are located in the Los Angeles area, almost all of which are in a narrow belt from Long Beach to El Segundo, and together the refineries process over one million barrels per day (California Energy Commission 2012). Because of the high demand from its large and dense population, and because there are no pipelines linking local refineries to other states, nearly all the gasoline and diesel fuel used in this region is produced locally.

5,194

Number of active oil wells in the County of Los Angeles

70%

Percentage of active oil wells in City of Los Angeles located within 1,500 feet of a home or sensitive land use such as a school or hospital

50%+

Percentage of census tracts in L.A. County (many of them close to active oil wells) that ALREADY rank in the state’s top 20% of most environmentally polluted and socially vulnerable areas according to CalEnviroScreen

280-400 GALLONS

Amount of wastewater produced for every barrel of crude oil extracted

WORST IN THE U.S.

Rating by the American Lung Association of L.A.’s air pollution from ozone, also known as “smog.” Oil production has been linked to increased smog levels

Methods of Oil Extraction

The Los Angeles basin is the most petroleum-dense basin in the world (Signal Hill Petroleum 2014). In the 1980s and 1990s, as the price of oil dropped and property values rose, oil wells around Los Angeles were capped and oil production fell (Gamache and Frost 2003). Today, the Los Angeles basin is witnessing a resurgence in oil production as old

⁵ Additional oversight is provided by the California Air Resources Board and the California State Water Resources Control Board, as well as local jurisdictions.

⁶ http://www.conservation.ca.gov/dog/Online_Data/Pages/Index.aspx

⁷ These five companies include Plains Exploration & Production (25.1%), Tidelands Oil Production (16.9%), Warren Exploration & Production (16.9%), Brea Canon Oil (7.8%), Southern California Gas Company (7.6%).

The oil and gas industry in the United States creates more solid and liquid waste than all other categories of municipal, agricultural, mining, and industrial wastes combined.

wells are uncapped, new wells are drilled, and the industry is actively working to pull more oil out of the ground within an even more populous city. Nationally, as oil has been depleted from conventional geologic formations, the oil industry has pursued “unconventional oil,” defined as “resources that are deeper or more difficult to recover than those that have been recovered historically” (U.S. Environmental Protection Agency 2008). However, Los Angeles still contains large quantities of migrated oil that are extracted using a combination of conventional drilling, Enhanced Oil Recovery (EOR) and unconventional technologies. Only 10 percent of a reservoir’s oil can be recovered by conventional practices. The rest must be accessed through ramped-up methods using EOR techniques that include injecting steam, gas, and/or chemicals to produce more oil from a well. These techniques are employed after easy-to-produce oil has already been recovered (U.S. Department of Energy 2014).

Los Angeles has also seen the introduction of some unconventional drilling techniques, such as acidizing and hydraulic fracturing. Unconventional drilling practices include the use of long-range and directional drilling to

vertically drill thousands of feet below the surface and then directionally (horizontally) for up to two miles, though in California this distance tends to typically be tens to hundreds of feet away from a well (DOGGR 2013). While directional drilling technologies are typically used to pull difficult-to-access oil in tight geologic formations, in Los Angeles these more aggressive technologies are used to access oil pools that are farther away from a well pad, to circumvent restrictions on creating new well pads and to avoid the social and political ramifications of extracting oil from dense residential neighborhoods through more conventional methods.

In Los Angeles, these technologies are employed to extract oil from small areas and densely populated neighborhoods, with the community just outside the fence line. Thousands of barrels of oil are extracted from wells that can be across the street or next door to a residence.

Environmental and Toxic Chemical Impacts

The oil and gas industry in the United States creates more solid and liquid waste than all other categories of municipal, agricultural, mining, and industrial wastes combined (O’Rourke and Connolly 2003). The industry

KEY DEFINITIONS FOR OIL DRILLING & PRODUCTION

Directional Drilling	The drilling of non-vertical wells (U.S. Environmental Protection Agency 2010).
Enhanced Oil Recovery	Various methods used with mature wells to increase oil and gas production. Includes injection of water, steam, gas and/or chemicals down the well and into the subsurface to improve flow and help push the petroleum to the surface.
Acidizing	Used in sites across Los Angeles. Often referred to as matrix acidizing, thousands of pounds of acid are injected into wells, where they dissolve the sediments, allowing the oil to flow to the wellhead to be collected. Both hydrofluoric acid and hydrochloric acid are used in these operations. These acids are so corrosive that other chemicals are added to the mixture to ensure the acids dissolve only the intended rock formations rather than the steel casings used to drill the well.
Steam Injection	Used in the Wilmington Oil fields. It is an enhanced oil recovery method injecting very hot steam into wells to extract deeper, heavier (and dirtier) crude.
Water Flooding	A type of enhanced oil recovery in which water is injected into a formation in order to mechanically move heavy oil from one well to another to be collected. Water flooding is used in many oil fields in the L.A. basin.
Gravel Packing	Method used to hinder the introduction of sand into the oil being produced, which damages oil field hardware. The zone surrounding the well bore is packed with gravel, which acts as a filter to prevent sand entering the well. Gravel packing stabilizes the surrounding rock, and is typically used in hydraulic fracking. (Sanchez and Tibbles 2007).

Exposure to ozone is linked to problems including the triggering of asthma attacks, an increase in emergency room visits, decrease in lung function, and premature death.

emits chemicals such as benzene, toluene, xylene, formaldehyde, and nitrogen oxides—to name a few—and has been implicated in exposure through air, water, and soil (Shonkoff, Hays, and Finkel 2014).

Oil extraction is a water-intensive activity. After a well is stimulated, some of the volume of fluid returns to the surface. This wastewater is a combination of stimulation fluids (often termed “flowback”) and “produced water,” which is extracted from the ground along with the oil. “Produced water” can be reinjected into wells under high pressure to force more oil to the surface, or reinjected into the formation to maintain pressure, or it can be sent to disposal wells. “Flowback” contains many chemical additives known to be harmful to health that are included in the injected stimulation, and “produced water” can be contaminated with byproducts from drilling, such as volatile organic compounds and heavy metals. On average, about 280–400 gallons of water (7–10 barrels) are produced for every barrel of crude oil extracted (U.S. Department of the Interior, Bureau of Reclamation 2011).

Oil drilling practices such as acidizing and hydraulic fracturing rely on a mixture of chemicals that are injected into wells. These can include surfactants, solvents, and corrosion inhibitors, some of which are known carcinogens, reproductive toxins, and endocrine disruptors⁸. For example, one study of wells stimulated through hydraulic fracturing in Colorado identified 944 products used in natural gas drilling and could find toxicity data for only 353 of these. Of these 353, the study found that more than 75% could affect the skin, eyes, and other sensory organs; 40–50% could affect nervous, immune, and cardiovascular systems; 37% could affect the endocrine system; and 25% could cause cancer and mutations. This study points to the problem of lack of disclosure of chemicals used in these processes and the need for full disclosure of all chemicals used in drilling. It also points to the need for air and water monitoring and coordinated human and environmental health studies (Colborn, Kwiatkowski, Schultz, and Bachran 2011).

In Los Angeles, a report by a coalition of environmental justice and environmental organizations based on new disclosure requirements by the South Coast Air Quality Management District (SCAQMD) examined chemicals that were released from event reports filed since June 2013 (Physicians for Social Responsibility et al. 2014). These include 170 acidizing, 95 gravel-packing, and 11 hydraulic-fracturing events.

Chemical reporting by operators in the SCAQMD set includes air toxics such as crystalline silica, methanol, hydrochloric acid, hydrofluoric acid, 2-butoxy ethanol, ethyl glycol, xylene, amorphous silica fume, aluminum oxide, acrylic polymer, acetophenone, and ethylbenzene. Chemicals listed include known carcinogens, reproductive toxins, endocrine disruptors, and mutagens. However, the full extent of the use of these chemicals is unknown, since companies can withhold chemical identities and mixtures under “trade secret” protections (Air Quality Management District 2013).

Air Toxics and Human Health Hazards

Oil drilling, extraction, and development is associated with a variety of health-damaging air pollutants (Helmig et al. 2014). Air pollution is linked to many adverse health outcomes such as asthma, exacerbated heart disease, and low birth weight (Peden 2002; Wilhelm and Ritz 2005). As oil production has increased, residents in Los Angeles communities living near oil wells routinely report symptoms of dizziness, nosebleeds, headaches, and exacerbated asthma (Sahagun 2013). Corroborating on-the-ground experiences, there is a growing literature linking unconventional oil and gas drilling with increased air pollution, water contamination, noise pollution, and stress (e.g., Adgate, Goldstein, and McKenzie 2014; Helmig et al. 2014; Shonkoff, Hays, and Finkel 2014). Environmental justice communities face a “double jeopardy” from air pollution that can compound the effects of already high exposures to environmental hazards.

These communities often suffer from the cumulative effects of poverty, lack of access to adequate health care, and illnesses that can leave individuals more vulnerable to the toxic effects of pollution (Morello-Frosch et al. 2011). In the Los Angeles area, poor air quality is an ongoing problem for low-income communities of color, who are disproportionately exposed to air toxics from industry, goods movement, and autos on a vast network of highways and roads (Sadd et al. 2011). The oil industry is the largest industrial source of volatile organic compound (VOC) emissions, a group of chemicals that contribute to smog and ground-level ozone (EPA, 2014), which make up the primary components of Los Angeles smog. In 2008, the EPA estimated that VOC emissions from the oil and natural gas industry exceeded 2.2 million tons per year, data that has not been updated since the boom in oil and natural gas production over the past few years (EPA 2014). Exposure to ozone is linked to problems including

⁸ Endocrine-disrupting compounds disrupt the body's hormone systems. This can happen at very low levels of exposure and exposures are especially concerning during vulnerable stages of human development (such as the fetal stage), which can lead to irreversible health problems even decades after an exposure (Zoeller et al. 2012). Most of these compounds remain unregulated and those that are regulated have thresholds far above those at which endocrine disruptors can cause harm.

the triggering of asthma attacks, an increase in emergency room visits, decrease in lung function, and premature death (Jerrett et al. 2005; McConnell et al. 2010). Los Angeles already has the worst ozone pollution in the United States (American Lung Association 2014).

States that have expanded drilling operations have documented elevated levels of VOCs and worsening ozone levels in areas near drilling operations, and they have called for buffer zones, setbacks, and continual air-quality monitoring near oil and gas fields, concluding that “there is a strong causal link between oil and gas emissions, accumulation of air toxics, and significant production of ozone in the atmospheric layer.” (Edwards et al. 2014; Olaguer 2012).

Particulate matter is composed of very small particles that can move deep into the lungs and enter the bloodstream, and can contribute to heart problems, lung cancer, respiratory illness, and premature death. Sensitive populations such as fetuses, young children, and the elderly are at particular risk (Pope 2000). Particulate matter emissions from oil operations come from diesel vehicles used for transport, dust entering the air during well-pad construction, and diesel engines used to power machinery at oil facilities. Particulate pollution is also emitted during flaring operations, which is common in refineries, but also occurs at wells. When a well is first drilled, it is tested to determine the characteristics of the underground reservoir, such as pressure, flow, and composition of the oil in the well. The flaring can last for a few days or a few weeks, depending on when the flow of oil from the well and the pressure are stabilized. Flaring creates significant air pollution and increased exposure to particulates.

The hazardous air pollutants (HAP) emitted from oil fields include benzene, toluene, ethylbenzene, xylenes (collectively referred to as BTEX), and many others. Benzene is a known human carcinogen and has been linked to leukemia, lymphomas, and other hematological (blood) cancers. Maternal benzene exposure has been associated with decreases in birth weight and head circumference (Slama et al. 2009). A recent scientific review of benzene’s health effects noted, “There is probably no safe level of exposure to benzene, and all exposures constitute some risk in a linear, if not supralinear, and additive fashion.” (Smith 2010).

The benzene content of gasoline is strictly regulated by the Environmental Protection Agency (EPA), which in 2011 lowered the allowable concentration in gasoline from 1% to 0.62% in an effort to reduce cancer risk. The State of California requires under Proposition 65 that oil companies warn the public regarding hazardous chemicals, including benzene and toluene. While the South Coast Air Quality Management District now monitors for benzene in some instances (e.g., in Wilmington, largely due to organizing by environmental justice groups), there is little

or no benzene monitoring in other Los Angeles oil fields. As a result, there is insufficient data on benzene emissions in communities where oil wells are located.

Air pollution has been connected to adverse birth outcomes such as infant mortality, birth defects, and low birth-weight⁹ (Morello-Frosch et al. 2010; Ponce et al. 2005; Proietti et al. 2013; Ritz 2002). While the dynamics leading to adverse birth outcomes are complex, including a combination of maternal health and social factors such as poverty, genetics, and environment, there are growing concerns over exposure for pregnant

Demographic Characteristics in Selected Areas Hosting Oil Production Facilities

LOCATION	PEOPLE OF COLOR	200% POVERTY	RENTERS	LINGUISTICALLY ISOLATED	LESS THAN HIGH SCHOOL EDUCATION
L.A. County	72.6%	37.3%	46.9%	12.4%	27.0%
L.A. City	72.9%	44.5%	56.2%	18.7%	30.8%
Within 1,500 ft. of an active L.A. City well	74.4%	42.3%	55.7%	18.5%	30.3%
University Park: Allenco	87.0%	72.6%	90.6%	50.0%	42.5%
Historic West Adams: Jefferson	83.4%	73.5%	70.9%	27.0%	48.5%
Historic West Adams: Murphy	89.7%	60.2%	73.4%	21.8%	35.5%
Wilmington: Warren E&P	99.7%	53.6%	76.6%	42.4%	54.3%
Baldwin Hills: Inglewood Oil Field	78.8%	45.2%	34.9%	2.0%	30.1%

Analysis by authors using the 2010 US Census.

Sensitive Land Uses in Selected Areas Hosting Oil Production Facilities

LOCATION	NUMBER OF SCHOOLS	CHILDCARE FACILITIES	SCHOOLS PER 10,000 PEOPLE	CHILDCARE PER 10,000 PEOPLE	CHILDCARE PER SQ. MILE
L.A. County	3,036	3,903	3.09	3.98	1.6
L.A. City	1,087	1,385	2.88	3.67	2.9
Within 1,500 ft. of an active L.A. City well	40	29	3.25	2.35	1.5
University Park: Allenco	5	2	7.83	3.13	8.0
Historic West Adams: Jefferson	1	2	1.29	2.59	8.0
Historic West Adams: Murphy	3	1	5.44	1.81	4.0
Wilmington: Warren E&P	0	1	0.00	2.35	2.4
Baldwin Hills: Inglewood Oil Field	2	7	3.64	2.35	4.4

Analysis by authors using the 2010 US Census.

CA Department of Education CBEDS, 2013, State Licensing Division, 2013 Dun and Bradstreet and Southern CA Association of Governments, 2008.

⁹ Low birth-weight is defined as, “the percent of live births weighing less than 2,500 grams (5.5 pounds).”

The juxtaposition of oil facilities with residential land is both a historical accident and zoning failure, but it is not safe, prudent, or reasonable.

women and fetuses in drilling-intensive regions. For example, a study near gas-drilling operations found that density and proximity of wells were associated with congenital heart defects (McKenzie et al. 2014). A review of the scientific literature found that many chemicals used in unconventional oil and gas operations have been measured in air and water near operations, linked with adverse reproductive and developmental health outcomes in laboratory studies, and associated with adverse human reproductive health outcomes in epidemiological studies (Webb et al. 2014).

South Los Angeles, the location of several new and restimulated wells, and home to communities profiled in this report, already has a higher rate of low birth-weight births (8.1%) than seen across the rest of Los Angeles County (7.1%) and the State of California (6.8%) (Los Angeles County Department of Public Health 2013)¹⁰, with some zip codes (e.g., 90007 and 90008) facing low birth-weight rates as high as 11% and 12% in babies born in 2012. Existing high rates of low birth-weight indicate chronic underlying health vulnerability. New and newly opened oil wells present an environmental hazard that exists on top of this underlying vulnerability. Babies born with low birth-weight are at an increased risk for death in the first year and for serious long-term health problems. Local variations in air pollution can impact these outcomes, making them more severe near more concentrated pollution sources (Wilhelm and Ritz 2005). Increases in air pollution from increased oil production in already vulnerable areas have the potential to increase the incidence of adverse birth outcomes.

Oil Extraction and Environmental Justice

It has been well documented that a variety of environmental hazards and public health threats throughout the greater Los Angeles area are concentrated in neighborhoods with high rates of poverty, unemployment, linguistic isolation, and a higher residential proportion of people of color (Sadd et al. 1999; Morello-Frosch et al. 2002; Hricko 2008). Similar patterns have been documented in other metropolitan areas, and on a national scale, all are referred to under the umbrella of “environmental justice.” The presence of environmental justice neighborhoods in the Los Angeles area is clear and widely accepted. Governmental and regulatory agencies recognize this problem, and have developed programs and fashioned procedures for their study and solution.

We find that several of the neighborhoods in Los Angeles now experiencing expanded oil drilling and development exhibit strong

Population Density and Percent Children and Elderly in Selected Areas Hosting Oil Production Facilities

LOCATION	POPULATION (2010)	LAND AREA (mi²)	POP DENSITY (10³ persons /mi²)	POPULATION AGE < 5	POPULATION AGE > 64
L.A. County	9,818,605	2,477	3,964	5.4%	13.1%
L.A. City	3,775,046	470	8,032	7.6%	8.5%
Within 1,500 ft. of an active L.A. City well	123,147	19.57	6,293	4.4%	11.2%
University Park: Allenco	6,382	0.25	25,528	4.2%	5.9%
Historic West Adams: Jefferson	7,729	0.25	30,916	7.1%	6.9%
Historic West Adams: Murphy	5,516	0.25	22,064	5.9%	13.6%
Wilmington: Warren E&P	4,258	0.42	10,138	10.0%	7.3%
Baldwin Hills: Inglewood Oil Field	5,501	1.59	3,462	4.0%	20.7%

Analysis by authors using the 2010 US Census and Southern California Association of Governments, 2008.

patterns of disproportionate exposure to hazards and risk, as well as high socioeconomic vulnerability. Indeed, they are classic “environmental justice” neighborhoods with high proportions of people of color, and many health, economic, and social challenges (American Lung Association 2014; Morello-Frosch et al. 2002; Morello-Frosch, Pastor, and Sadd 2001; Sadd et al. 2011). Some neighborhoods hosting oil production facilities have much higher proportions of people of color, low-income residents who are often renters, adults over age 25 with low educational attainment, and the linguistically isolated, defined by the U.S. Census as households where no one over age 14 speaks English well. These relationships are particularly striking in the Wilmington, Harbor Gateway, and Mid-City neighborhoods of Los Angeles.

Another way to investigate the non-occupational impacts of oil production is by evaluating the proximity of these facilities to populations in various communities. The California Air Resources Board (CARB) issued recommendations to local government for creating buffers for sensitive land uses such as schools, hospitals, urban parks and playgrounds, and daycare centers, to separate them from sources of air toxics (California Air Resources Board 2005). A recent report written by the City of Los Angeles

¹⁰ Data comprises the Southwest Health District within Service Planning Area 6 of the Los Angeles Public Health Department.

MAP 2: Proximity of New and Active Oil Wells to Residential Areas in South Los Angeles



Land use within 1,500 feet of new and active wells in in South Los Angeles (Data from Southern California Association of Governments 2008).

Planning Department recommends that the City develop new land use and zoning regulations for oil and gas operations, citing a similar ordinance passed by the City of Dallas in 2013. CARB guidelines, for example, recommend 1,000 feet from most land uses characterized by high levels of air toxics emissions. Locally, the South Coast Air Quality Management District Rule 1148.2¹¹, passed in 2013, requires notification and reporting of oil drilling activities within a 1,500-foot zone.

Of the 1,071 active oil wells in the City of Los Angeles, 759 (over 70%) are located within a 1,500-foot buffer distance from residences and other sensitive land uses. In some of these areas, people and sensitive populations are also concentrated at levels higher than regional averages. A comparison of socioeconomic indicators for residents living within 1,500 feet of active wells demonstrates that the local impact of oil production is significant in some neighborhoods hosting active oil production wells. For example, population density is several times higher in these neighborhoods. There is a similar relationship with a higher proportion of “sensitive land uses” close to active oil wells—these land uses (e.g., schools and childcare facilities) have been defined by CARB as deserving special attention because biologically sensitive populations spend

extended time in these facilities (CARB 2005). Similarly, the proportion of people who are biologically sensitive to air pollution and cancer-causing chemicals—the very young and the elderly—is higher in some of these areas when compared to regional averages.

Another way to evaluate oil production in terms of environmental justice—the extent to which these facilities are located in already overburdened neighborhoods—is by use of CalEnviroScreen 2.0¹², the screening methodology developed by CalEPA to help state regulatory agencies identify California communities that are disproportionately burdened by multiple sources of pollution¹³. Many oilfields inside the city boundaries are located in areas identified by CalEnviroScreen 2.0 as among the most overburdened in the entire state.

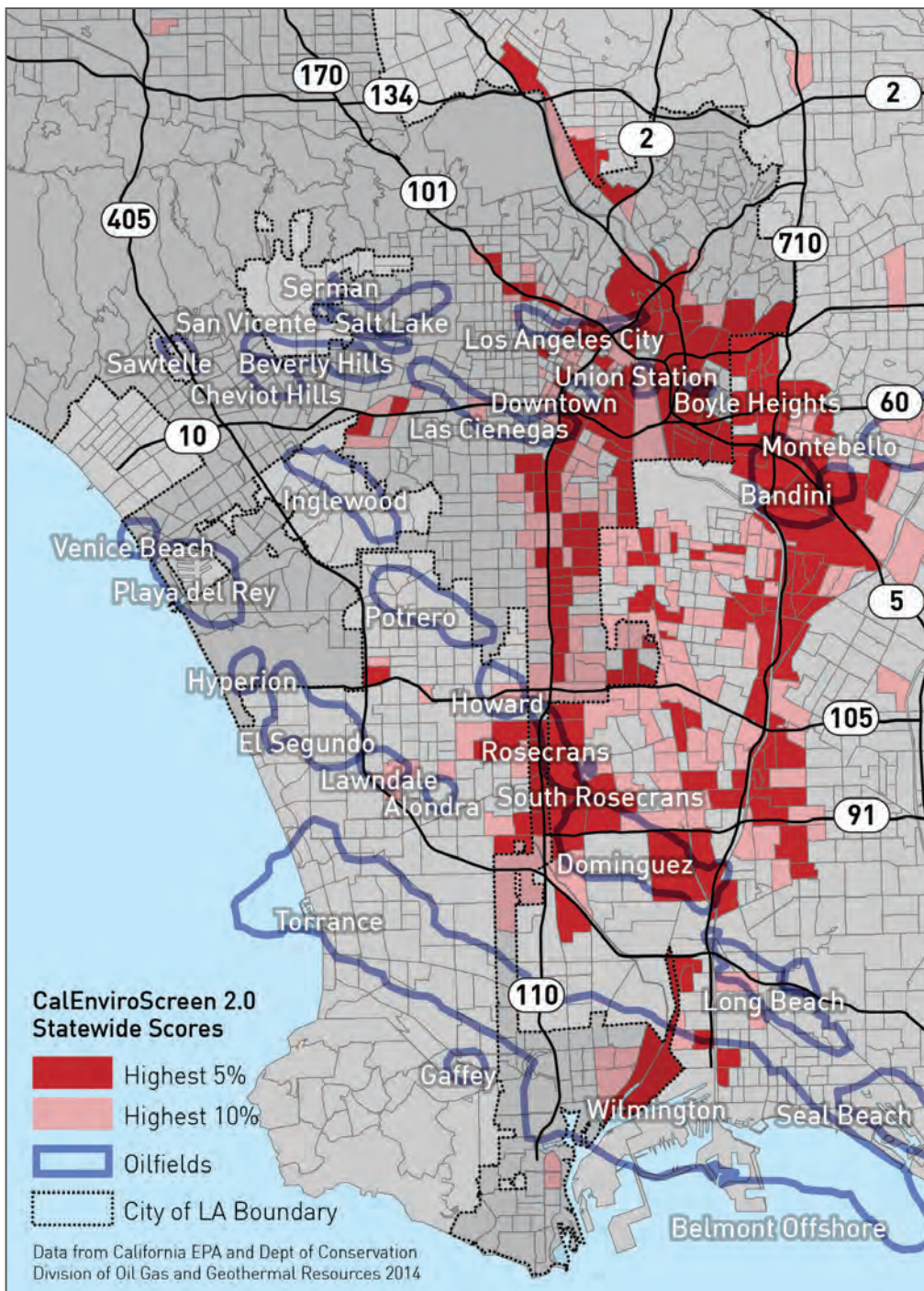
Land use in the vicinity of active oil production varies in different parts of Los Angeles, exposing communities to real and potential impacts of oil production. Some oilfields in the Los Angeles region are surrounded by open space or industrial, commercial, or vacant land. However, in some neighborhoods, this highly industrial and potentially hazardous activity takes place adjacent to residences, schools, parks, and public facilities.

¹¹ <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1148-2.pdf?sfvrsn=4>

¹² A screening method developed by CalEPA Office of Environmental Health Hazard Assessment that is used by state government agencies to identify communities that are disproportionately burdened by multiple sources of pollution. CalEnviroScreen uses science-based techniques to evaluate multiple pollution sources and the resident population's vulnerability to that pollution's adverse effects, calculating a score for each census tract in the state. A final score, expressed as a percentile, is calculated from the ranked values for all tracts statewide. The highlighted tracts in Map 3 have percentile scores that are in the top 10% of all tracts statewide for all indicators of pollution burden and population vulnerability used by the CalEnviroScreen tool.

¹³ <http://oehha.ca.gov/ej/eces2.html>

MAP 3: Proximity of Environmental Justice Communities to Oil Fields in the Los Angeles Region



Shown are census tracts with CalEnviroScreen 2.0 scores in the top 5% and 10% statewide and their proximity to oil fields in the region. CalEnviroScreen 2.0 is the State of California's official tool for identifying communities that are disproportionately burdened by multiple sources of pollution and high levels of social vulnerability. Note that five of the six oil fields wholly within the City of Los Angeles' boundaries affect communities within the top 5% and top 10%. These oil fields are Boyle Heights, Las Cienegas, Los Angeles City, Los Angeles Downtown and Union Station.

Almost one quarter (253/1,059) of active wells in the city are located on residentially zoned land (mostly multifamily and high density). Map 2 shows the juxtaposition of residential land with active oil production wells in the South Los Angeles area. These and other communities are profiled in the next section of this report, "Families on the Frontlines."

The Problem of Proximity

Why do we consider oil development in close proximity to people a problem? These activities are not compatible with densely populated neighborhoods with sensitive populations and pose a threat to human health and the environment. Oil is extracted using technologies such as acidizing that use harsh chemicals such as hydrochloric acid, as well as a mix of chemicals that are identified carcinogens, reproductive toxins, and endocrine disruptors.

Oil drilling and production adds to the burden of air pollution in these neighborhoods. The city has battled air pollution for decades and still faces the worst levels of ozone in the country, and the chemicals and particulates in air pollution have been linked to a variety of health problems such as exacerbated asthma, adverse birth outcomes, and premature death. Environmental justice neighborhoods in Los Angeles face higher levels of air pollution and worse health outcomes than residents of the region overall, and these residents tend to be more vulnerable to these environmental threats.

Many of the neighborhoods that host oil drilling and production have already been identified by cumulative impacts screening because of their high exposure to environmental hazards and pollution, and the high vulnerability of their residents. These communities have high proportions of people of color, high poverty and language barriers, low home ownership and education, and concentrations of schools and childcare. Oil development

is a highly industrial activity which generates considerable pollution and risk to those living, playing and going to school just over the fence line. The juxtaposition of oil facilities with residential land is both a historical accident and zoning failure, but it is not safe, prudent, or reasonable.



FAMILIES ON THE FRONTLINES: WHEN OIL IS YOUR NEIGHBOR

Heavy equipment at the Jefferson Drill Site is right next to homes in the Historic West Adams neighborhood.

Los Angeles neighborhoods are defined in many ways—by geography, density, history, and more. The neighborhoods described in the following pages are defined by their proximity to a particular oil drilling facility.

In University Park, near the University of Southern California (USC), Monic Uriarte describes how nauseating fumes clued the community in to the fact that the Allenco drill site was behind the high walls near their homes. In Historic West Adams, west of USC, Richard Parks and other residents were alarmed to learn that the Jefferson drill site, a local eyesore with its concrete wall and trashy parkway, was pumping carcinogenic chemicals under their homes.

Historic West Adams, with homes dating from the turn of the 20th century, is also home to what Don Martin, Joanne Kim, and other residents know as the Murphy drill site. It opened in the 1960s, but in recent years new extraction techniques have exposed the community to new hazards. In Wilmington, near the ports of Los Angeles and Long Beach, Ashley Hernandez is deeply worried about expansion of the Warren E&P drill site because air pollutants from the site have already hurt her family's health.

Baldwin Hills is one of three neighborhoods bordering the Inglewood Oil Field. Residents there, including Charles Zacharie, monitor health and environmental impacts of drilling on Baldwin Hills, Inglewood, and Culver City.

Together, these stories of concerned and active neighbors paint vivid pictures of Angelenos hit hard by the day-to-day consequences of expanded urban oil development.

When Regulators Fail

University Park: Allenco Drill Site

Barbara Osborn, Ph.D., *Annenberg School of Communications and Journalism, University of Southern California*

Monic Uriarte placed the first of dozens of calls to the South Coast Air Quality Management District (SCAQMD)'s "odor complaint" line in late 2010. She and her family smelled a strong, unpleasant odor in the air on the long weekend of the Martin Luther King holiday. They had smelled odors before, but not like this. In the past, odors had passed in minutes. Monic began to feel nauseous. Her 10-year-old daughter Nalleli's nose began bleeding. That night, Monic turned on an air purifier in her bedroom and she, her four kids, and her mother squeezed into one room so they could sleep.



Monic Uriarte and daughter Nalleli suffered for years from unexplained health problems.

The stench persisted. Monic and her neighbors on West 23rd Street, near the University of Southern California, located the odor complaints number at the SCAQMD and began calling. That was when she realized that the narrow strip of grass across from her home, where she'd taken her kids for picnics, was the landscaped exterior of the Allenco Energy oil drilling facility. It would be years before she would learn that Allenco had recently increased its production at the site 400% (Sahagun, September 21, 2013).

After several days the smell subsided, but Nalleli began complaining of intense stomachaches and headaches. She developed heart palpitations and severe body spasms. For a time, she was not able to walk. Monic took Nalleli to a cardiologist, a gastroenterologist, and a neurologist. Nalleli had an MRI and wore a heart monitor for weeks, but doctors couldn't explain the little girl's illness.

Meanwhile, the overpowering odors came and went. Monic's neighbors called the SCAQMD regularly. They learned to provide exactly the information that SCAQMD operators required to dispatch an inspector: Their name. Their location. The location and description of the smell. They learned that the SCAQMD has to receive six calls from people in six different households before it can determine whether the odor issue is a public nuisance. It took several hours, sometimes days, for the SCAQMD to respond. Monic would call with a complaint on a Sunday, leave a message, and get a call back on Tuesday.

In the best of circumstances, neighbors would reach a live SCAQMD operator and a sufficient number of calls were made within the hour to warrant dispatching an inspector. Three or more hours later, an inspector would arrive, put his or her nose in the air and sniff. If the inspector didn't smell anything, no complaint could be filed.

For two years, community residents called the SCAQMD with hundreds of complaints and nothing changed. They still didn't understand what was making so many of them sick. The community tried to conduct its own air quality monitoring but without knowing the chemicals that were being emitted from the Allenco facility, they couldn't tell the lab what to look for. By attending a toxicologist's lecture, Monic finally identified an explanation for her daughter's illness. Nalleli's symptoms were all consistent with exposure to hydrogen sulfide (H_2S), a flammable, colorless gas that occurs naturally in petroleum and natural gas. Exposure triggers respiratory irritation, headache, dizziness, and vomiting (Sahagun, September 21, 2013).

By chance, Monic and Nalleli finally got a close look at what lay behind the high walls surrounding the Allenco facility. They'd enrolled in a local photography workshop and their assignment was to take photographs of their community. As they walked their neighborhood taking pictures, they discovered the gates of the Allenco facility open. They asked a worker if he could show them around and the man took them to see the wells. He explained he had to open release valves every 10 or 15 minutes or they would explode. Pipes near the wells read "Danger: H_2S poisonous gas" (Sahagun, September 21, 2013). Monic recalls that as they entered the underground area near the wells, she felt as if "her head was going to explode," but the worker wore no protective gear and didn't suggest to Monic or her daughter that they needed any.

Neighbors began sharing information and struggling to get regulatory agencies to be more responsive. They formed a neighborhood group called "People Not Pozos." ("Pozos" is a Spanish word meaning "well.") Members of the group approached the *L.A. Times*, and after a *Times* article appeared

They learned that the SCAQMD has to receive six calls from people in six different households before it can determine whether the odor issue is a public nuisance.



Nalleli and her neighbors do not want the Allenco facility to reopen.

in September 2013, Senator Barbara Boxer's office got involved. Suddenly, regulatory agencies became responsive. The SCAQMD began returning Monic's calls within two hours instead of two days.

Investigators from the United States

Environmental Protection Agency (EPA) came to the neighborhood and were sickened on the site (Sahagun, November 8, 2013).

Late in November 2013, Allenco agreed to temporarily close the facility. For the first time in years, residents were able to enjoy Thanksgiving with their windows open. Their symptoms cleared. Monic had no headaches. Nalleli's nosebleeds and stomachaches disappeared.

Two months later, the EPA cited Allenco for jeopardizing the health of the community (Sahagun, January 15, 2014). The L.A. City Attorney's office filed suit, citing SCAQMD monitoring that now revealed elevated

concentrations of hydrocarbons and other chemicals like methane, ethane, benzene, and propane, plus hydrogen sulfide and other sulfur compounds. Allenco agreed to make \$700,000 in upgrades to comply with the federal Clean Air and Clean Water Acts (Duronì 2014). In July 2014, the U.S. EPA fined Allenco \$99,000 for failure to comply with requirements around hazardous substance reporting, while the suit by the L.A. City Attorney alleged that the company was "willfully disregarding violation notices" from regulatory agencies (Sahagun, July 30, 2014).

But after years of fighting to get regulators to respond, Monic and her neighbors don't want the facility reopened. She has lost confidence that the regulatory agencies which were supposed to protect her family have made the changes in their own procedures to ensure community health in the future. Monic has lost her sense of smell, a symptom consistent with hydrogen sulfide exposure, and without it, she can't be sure she could detect toxic chemicals if she were exposed to them.

Nancy Ibrahim, executive director of the Esperanza Community Housing Corporation, which owns two buildings on 23rd Street near the Allenco facility and whose tenants were affected by the fumes, says, "Since 2011, residents logged in hundreds of phone complaints to SCAQMD and nothing changed. This is a residential community with nine educational institutions and early childcare facilities. Residents were left entirely unprotected by the regulations that are supposed to protect them. SCAQMD's current procedures are not adequate to safeguard the health of this or any other neighborhood."

MAP 4: Land use within 1,500 Feet of the Allenco Energy Oil Facility in University Park



(Data from Southern California Association of Governments 2008).

“How are these chemicals being used?”

Historic West Adams: Jefferson Drill Site

Barbara Osborn, Ph.D., Annenberg School of Communications and Journalism, University of Southern California

“At first, all we wanted were good neighbor kind of things,” explained Richard Parks, the father of three young children who lives in a neighborhood off Jefferson Boulevard, just west of the University of Southern California in the City of Los Angeles.

Parks and his neighbors were unhappy that the entire block on Jefferson Boulevard between Van Buren and Budlong Avenues was an eyesore, littered with trash and graffiti and surrounded by a 10-foot concrete wall. Mothers picking up their children at local elementary schools were forced to push strollers into traffic because large trucks blocked the sidewalks, and the weight of those trucks was leaving sidewalks broken and unsafe.

In the beginning, neither Parks, the director of the Center for Social Innovation at USC’s Sol Price School of Public Policy, nor his neighbors had any idea they were about to stumble on a danger far more threatening than graffiti and unsafe sidewalks. As Parks and his neighbors began

to press for cosmetic changes, they learned that the site was owned by Freeport-McMoRan, a natural resources company. They also learned that Freeport-McMoRan planned to dramatically expand production. The company wanted permission to drill three new wells, in addition to the 29 already on the site, and the right to drill 24/7 for somewhere between two months and two years!

Then one Friday afternoon, almost by chance, Parks noticed an email about a public hearing involving the Freeport-McMoRan site to be held the following Tuesday. He cancelled his appointments for the afternoon and hustled to Los Angeles City Hall to find out what the hearing was about. To his astonishment, he discovered that Freeport-McMoRan was asking for permission to work around the clock to drill the three new wells on the site. If he hadn’t seen the email and run downtown, none of the families, nor the USC students who live in the neighborhood, would have known about it.

He quickly notified neighbors. Several residents attended the hearing, as did a small army of Freeport-McMoRan representatives. When the Department of City Planning asked for proof that the company had provided adequate public notice, Freeport couldn’t produce it. In fact, Parks learned, the company had repeatedly asked the City to waive the public hearing requirement. Faced with the company’s noncompliance and the community’s concern, the City refused to grant the permit.

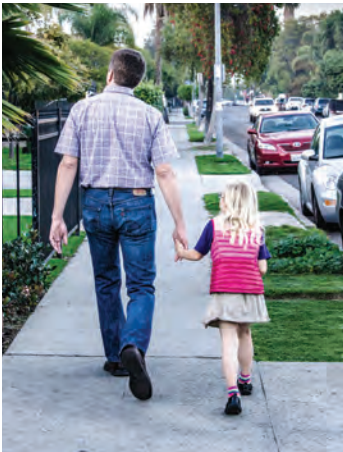
Shortly after the hearing, Freeport-McMoRan contacted Parks to set up a meeting. Parks suggested the company meet with key community stakeholders, including representatives from Congresswoman Karen Bass and Councilman Bernard Parks’ offices, but Freeport-McMoRan insisted on meeting with him alone. Parks agreed, and at that meeting, he shared the community’s concerns. The company executive scoffed, “Look, this isn’t exactly Laguna Niguel,” a reference to the beachside city where incomes are four times greater than the median income in Parks’ USC-adjacent neighborhood.

As Parks and other community residents shared their experiences with each other, their alarm grew. Neighbors recalled the day when their homes and cars were covered by a spray of oil. Something—to this day residents don’t believe they’ve received a full explanation—occurred on the site, and an adjacent home and cars on the street were sprayed with oil. Freeport-McMoRan paid to repaint the affected home and clean the cars. “The company called it a ‘misting,’” Parks says, “like it was a fine French perfume.”



Richard Parks and his family are residents of Historic West Adams near Jefferson Boulevard and Budlong Avenue which hosts one of Freeport-McMoRan’s oil drilling sites.

That summer, Parks learned that nearly 91,000 pounds of toxic chemicals including corrosive acids had been pumped under residents' homes in July 2014.

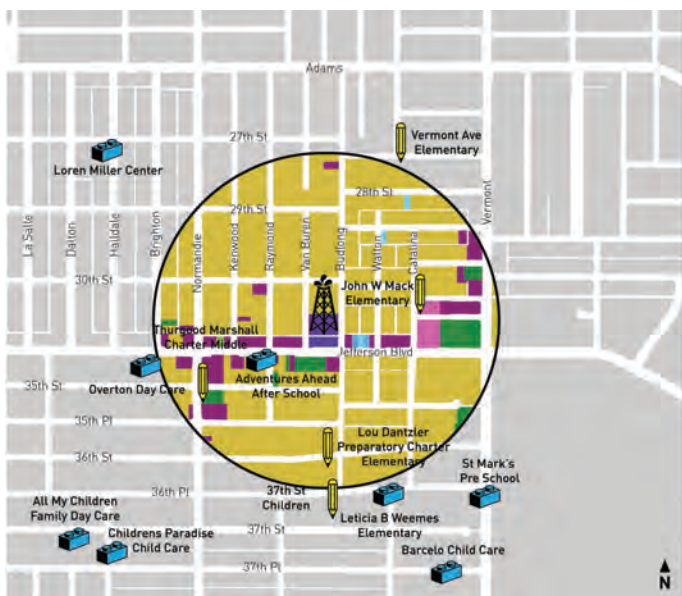


Residents walking children to school worry about hazards from oil wells.

In May of 2014, Parks was walking past the Freeport-McMoRan site and a truck pulled up with a long list of toxic chemicals posted on the outside. Thanks to the South Coast Air Quality Management District's regulation 1148.2, passed in 2013, Parks already knew that Freeport-McMoRan had injected more than 42,000 pounds of toxic chemicals (including corrosive acids and carcinogenic material) into the ground in the previous 12 months (South

Coast Air Quality Management District 2013). But the truck Parks saw that day listed additional toxic chemicals that had not been included in the company's report to the SCAQMD. Parks tried to talk to the driver and take a few photographs, but the driver quickly drove away. That summer, Parks learned that nearly 91,000 pounds of toxic chemicals including corrosive acids had been pumped under residents' homes in July 2014. (South Coast Air Quality Management District 2013). There was no doubt that unconventional oil drilling techniques were being used at the site.

MAP 5: Land use within 1,500 feet of Freeport-McMoRan's Oil Facility located at the intersection of Jefferson and Budlong in Historic West Adams



(Data from Southern California Association of Governments 2008).

Neighbors have begun to wonder whether a local resident's cancer or the fact that mature trees on an adjacent lot are suddenly dying could be linked to soil contamination on the site. For now, the community has no way to answer those questions. The total disclosed chemicals used on the site between July 2013 to August 2014 has grown to 133,766 pounds. "Even my second-grader understands that injecting hundreds of thousands of pounds of acid in the ground isn't a good thing," Parks said.

Unexpectedly, early in 2015, Freeport-McMoRan decided to withdraw their application to drill an additional three wells on the site. None of the residents know why. Parks credits the drop in global oil prices and the extraordinary community response. But, he added, "the application withdrawal doesn't mean we can return to the status quo. The community documented numerous and serious violations of conditions that threaten residents' health and safety. The city now has a duty to hold Freeport-McMoRan Oil & Gas (FMOG) accountable for these violations and to strengthen conditions to better protect residents."

According to Parks, "At its best, Los Angeles is trying and failing to address our 21st century understanding of toxic chemicals' multi-generational health impacts with a planning code from the last century that was deeply influenced by the oil industry. At its worst, the City has allowed FMOG to sell vacant buffer properties to residential developers. Instead of buffer properties serving residents, the Planning Department has turned residents into buffers. The conflict between the company and the community demonstrates the need to forge a new and stronger

regulatory framework. In the face of flagrant violations, the City needs a clear path to revocation of conditional land use permits for residential oil extraction."

Fumes, Fears, and Frustration Historic West Adams: Murphy Drill Site

Barbara Osborn, Ph.D., Annenberg School of Communications and Journalism, University of Southern California

One neighbor after another started to wonder what on earth was going on. First, an unsightly 20-foot-tall beige sound wall went up across the entire north side of the block around an oil facility known to locals as the “Murphy” drill site. Everyone who lived in the neighborhood of historic homes knew you couldn’t do that without a permit from the Historic Preservation Committee.



Don Martin and his granddaughter, Kiarri, live next door to the Murphy drill site.

Other neighbors complained about smells. Residents began sharing complaints about odors coming from the Murphy site and began to circulate information about what to do if you smelled something. That’s how Donna Ann Ward, who lives a few blocks from the Murphy site, knew to call the South Coast Air Quality Management District (SCAQMD) when she stepped into her backyard the morning of January 7, 2014 and thought she smelled something “sulfury” in the air.

She called the SCAQMD and four hours later, an inspector discovered a leak of “unodorized” natural gas at 40 times the allowable limit and issued a citation to Freeport-McMoRan Oil & Gas, the company that runs the site, which currently includes 22 active production wells and seven active injection wells. Donna’s phone conversation left her asking more questions: Is unodorized a technical term? It sounds like something that has had its odor removed. If it was unodorized, where was the “sulfury” odor coming from?

The incident made Donna Ann aware that the Murphy site might pose a fire hazard. According to the 2010 U.S. Census, 14,870 people live within a half-mile radius of the wells. Given that the neighborhood is home to a special needs high school, a 900-student elementary school, a hospice facility, and a senior housing complex, she wondered what kind of plans had been made in the event of an emergency.

All around the neighborhood, residents have similar stories. Don Martin lives next to the Murphy drill site, in the St. Andrews Gardens Apartments on West Adams Boulevard. The Section 8 complex includes 192 apartments with a basketball court and a kids’ playground at the heart of the complex. The Murphy drill site operates 24 hours a day.

Like many of his neighbors, Don keeps his windows closed most of the time, running up expensive air-conditioning bills, but it’s the best strategy for keeping out the noise, fumes, and ash that often blow across the apartment complex.

Don is also unnerved by the sign on the Murphy drill site entry gates: “Warning: This area contains chemicals known to the State of California to cause cancer or birth defects or other reproductive harm.” His 11-year-old granddaughter Kiarri developed Hodgkin’s lymphoma three years ago, and while he can’t prove it, he fears her illness is related to the Murphy site. He doesn’t believe regulators are really tracking what’s happening and he doesn’t trust the information Freeport-McMoRan is providing to the community. “They [Freeport-McMoRan] keep us out,” he says, “but they can’t keep the chemicals in.”

Donna Ann Ward feels similar fear and frustration. While Freeport-McMoRan says it has an Integrated Contingency Plan and Emergency Response Action Plan on file with the appropriate regulatory agencies, local fire station chiefs told her they did not have an emergency response plan, or even a map of the Murphy facility in the event of an explosion.

Other residents spent long hours reviewing City of Los Angeles Planning Department documents, trying to determine whether drilling at the Murphy site had been started without necessary permits, or was inappropriately approved.

Community concern culminated in January 2014, when 300 residents turned up at a meeting at Holman United Methodist Church, just a few blocks from the Murphy site. Los Angeles City Council President Herb

Local fire station chiefs told her they did not have an emergency response plan, or even a map of the Murphy drill facility in the event of an explosion.

Wesson, California State Senator Holly Mitchell, and United States Congresswoman Karen Bass were present. During the meeting, Wesson announced that he would instruct the Los Angeles Department of Building and Safety to stop the construction of the new wells. In addition, Freeport-McMoRan must now submit new plans and participate in public hearings to proceed with its expansion plans and the construction of new wells.

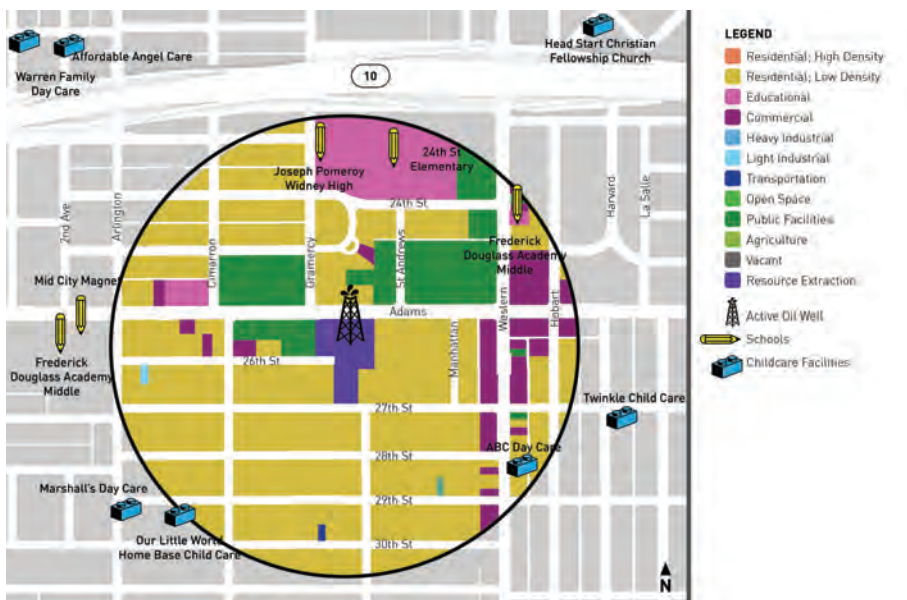
After the meeting, Wesson persuaded the Los Angeles City Council to pass a motion asking the City Attorney to draft an ordinance for a citywide moratorium on extreme and unconventional oil extraction until it was studied and deemed safe.

Residents are grateful for Wesson's efforts, but they continue to be deeply concerned about lack of transparency and inadequate regulation. Joanne Kim, who lives in the neighborhood with her husband and two young children, notes that at least eight different government agencies regulate the oil industry. "There are too many cooks in the kitchen, which makes it difficult for us to get a full picture of what's going on. Almost every agency we contacted directed us to another agency for answers." The type of drilling that's being done and the chemicals being used are qualitatively different than they were when the Murphy site first opened in the 1960s, she continues. "The way in which government regulates this unconventional activity in 2014 has also got to be qualitatively different."



Joanne Kim and her daughter live near the Murphy drill site.

MAP 6: Land use within 1,500 feet of Freeport-McMoRan's Murphy Oil Facility in the Historic West Adams neighborhood



(Data from Southern California Association of Governments 2008).

“No false solutions!”

Wilmington: Warren E&P Drill Site

Barbara Osborn, Ph.D., *Annenberg School of Communications and Journalism, University of Southern California*

When Ashley Hernandez sits on her front stoop with her dog Lucy, she smells oil in the air on the lovely tree-lined street in the Wilmington neighborhood in the City of L.A. where she and her family live. It doesn't matter whether it's day or night, the smell is always there. Half a block from her home, right next to the John Mendez baseball park, an enormous oil rig towers over Opp Street. It's open 24 hours a day, so the noise and the odors are a constant nuisance for the neighborhood.



Ashley Hernandez suffered health problems from oil drilling in her Wilmington neighborhood.

According to a recent analysis by California environmental agencies, parts of Wilmington (a neighborhood near the Los Angeles and Long Beach Ports), rank among the top 5% of communities with the highest pollution exposure and social vulnerability in the state (Office of Environmental Health Hazard Assessment CalEnviroScreen2.0, 2014). The most recent study from the SCAQMD (MATES IV 2014) reports significant reductions in cancer risk over the last decade. However, the estimated cancer risk in some parts of Wilmington is the highest in Southern California, exceeding 1,000 additional cancers per million residents, three orders of magnitude higher than the National Clean Air Act goal of one in one million. Moreover, new research from the State's Office of Environmental Health Hazard (OEHHA) has determined that previous methods for estimating cancer risk were insufficient, and cancer risk estimates are higher by nearly three times than previously understood.

Ashley is familiar with all these statistics, but they don't tell her anything she doesn't already know firsthand. She remembers when she and her family moved to Wilmington from North Hollywood, nearly 10 years ago, to be closer to her dad's new job at the Ports of L.A. and Long Beach. Her mother developed respiratory problems. Ashley developed a pollution-related eye irritation her senior year in high school that was so severe her attendance and grades suffered. Her doctor attributed both mother and daughter's health problems to particulates in the air in and around their home. Ashley's sister used to jog when she lived in Santa Barbara. Now she lives in Wilmington and her lungs simply won't tolerate it.

Her family's health is the prime reason Ashley is so concerned about the expansion at the Warren E&P site near her home, as well as oil extraction technologies being used elsewhere in the vicinity of the ports. Thanks to a new regulatory safeguard (SCAQMD Rule 1148.2), companies are now required to report plans to acidize, gravel pack, and frack, as well as to report the chemicals they use as part of their oil extraction practices. Ashley knows that oil companies in Wilmington are using known carcinogens and engaging in gravel packing and acidization. A recent report issued by the Center for Biological Diversity and Physicians for Social Responsibility, which examined the first year of data provided by the oil companies, revealed that more than 45 million pounds of dangerous chemicals had been used in Los Angeles and Orange counties. More than half of these “chemical-intensive events” occurred in oil wells within 1,500 feet of a home, school, or medical facility (Center for Biological Diversity, Physicians for Social Responsibility – Los Angeles, Communities for a Better Environment, and the Center on Race, Poverty and the Environment 2014).

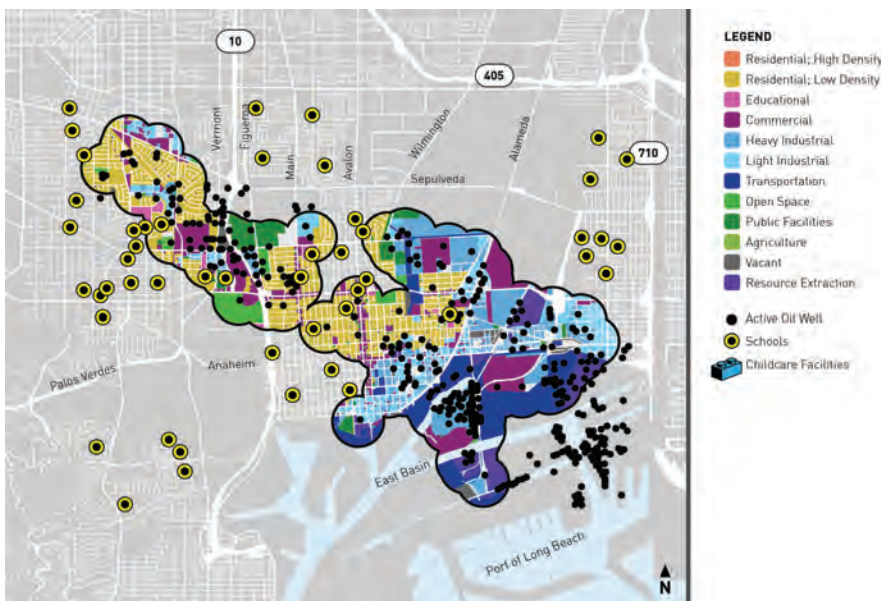
Data provided by the oil companies revealed that more than 45 million pounds of dangerous chemicals had been used in L.A. and Orange counties.

Those findings leave Ashley deeply worried. She has learned not to trust that Warren E&P will be a good neighbor or that regulatory agencies have the ability to safeguard her family or her neighbors' health.

The Hernandez family was new to Wilmington in 2006 when a local community organization, Communities for a Better Environment, documented the failure of regulatory agencies to protect the community after Warren E&P began to expand its operations at the site near the Hernandez home (Fazeli 2009). Both the City of Los Angeles and the SCAQMD failed to anticipate the health impacts on the neighborhood of increased truck traffic, dirt and dust blanketing the area, foul smells, and construction noise. The City and the SCAQMD permitted the company's day and night drilling application. Neighbors called it a "living hell" (Fazeli 2009).

Ashley doesn't have a lot of confidence in Warren E&P's transparency or integrity. Periodically, she says, representatives of Warren E&P go door-to-door offering neighbors free carwash coupons or gas gift cards. They sponsor the local Pony League that practices adjacent to the Warren E&P rig near her home. The company sponsors field trips for the local schools and built a park in the neighborhood on reclaimed land. Approximately 1,500 Wilmington residents receive royalty checks as a result of the drilling (Agostoni 2008). In Ashley's view "the company is offering false solutions that distract from the community's real health problems. A hundred dollar gift card is nice," she says, "but it won't pay for an emergency room visit."

MAP 7: Land use within 1,500 feet of Oil Wells in Wilmington



(Data from Southern California Association of Governments 2008).



Ashley Hernandez is now the Youth Organizer for Communities for a Better Environment in the Los Angeles area.

Largest Urban Oil Field in the Country

Baldwin Hills: Inglewood Oil Field Drill Site

Erin Steva, MPP, *Environmental Health Policy Analyst, Community Health Councils*



Charles Zacharie of Baldwin Village is concerned about the health effects of the largest urban oil field in the country.

More than one million people live within five miles of the Inglewood Oil Field, the largest contiguous urban oil field in the country. At 1,000 acres, located near the center of sprawling Los Angeles County, it is nearly as large as the City of West Hollywood. The people are as diverse as the surrounding Baldwin Hills, Inglewood, and Culver City neighborhoods—50% African American, 17% Caucasian, 15% Hispanic and 6% Asian-Pacific Islander (Los Angeles County Department of Regional Planning 2008).

Charles Zacharie of Baldwin Village grew up next to fields watching the pumping jacks bob up and down. Now, Charles says, “I drive past the field every day going to work and have noticed diesel or industrial smells like sulfur. I look at the field around me and know where it must be coming from.” He frequently visits the beautiful Kenneth Hahn State Recreation Area, which sits adjacent to the Inglewood Oil Field. When there, he’s noticed diesel odors and a soapy lemongrass fragrance, which he was later told is used to cover up odors. He’s unsettled by “odor suppressants,” because it means there are potentially dangerous fumes being disguised.

For the surrounding park-poor South Los Angeles neighborhoods¹⁴, Kenneth Hahn Park is an invaluable resource, giving residents a swath of open space and greenery in the midst of a sea of asphalt and concrete (Garcia, Meerkatz and Strongin 2010). But Charles, like many of his neighbors, is concerned about the health impacts of living and playing

so close to 700 active oil wells (Paillet 2013). He wonders whether his neighbors’ breast cancer or respiratory issues result from living near the field, and he’s concerned about new extraction technologies.

In early 2006, families in the Culver Crest neighborhood were evacuated twice for noxious odors (Los Angeles County Department of Regional Planning 2008). Local resident John Kuechle remembers waking up at three in the morning to a terrible smell that made his wife nauseous. They called the police to report the odor and evacuated their home. The oil field operator Plains Exploration & Production (PXP) described the odor release as a nonhazardous, once-in-a-lifetime event; but more incidents followed. When John asked a South Coast Air Quality Management District (SCAQMD) representative why the “nonhazardous” gas made his wife feel so ill, he learned that “nonhazardous” only meant non-explosive.

Around the same time in 2006, PXP revealed plans to drill as many as 1,000 new wells over the next 20 years. Charles and others had heard of plans to turn the oil field into a large park, and were disappointed and concerned about the effect of this proposal on those plans. Community Health Councils, the City Project, neighborhood associations, and block clubs formed the Greater Baldwin Hills Alliance to represent the 50,000 households living immediately adjacent to the oil field. Months after the noxious odor incident, Los Angeles County prohibited new drilling until 2008, providing time for the development of an ordinance to more effectively regulate drilling in the field.



John Kuechle recalls an evacuation from his home due to noxious odors from the Inglewood Oil Field.

¹⁴ There is less than one acre of parkland per 1,000 people in Baldwin Hills compared to the nationally recommended ratio of six to 10 acres per 1,000 people. The State of California’s definition of “park poor” communities is those with less than an average of three acres per 1,000.

“Just because the oil company brings jobs and other benefits doesn’t mean it can do it at the expense of my health and well-being,” said Charles Zacharie.

Residents and neighborhood associations mobilized to ensure the environmental study and proposed zoning regulations adequately addressed the hazards and health risk to the community. Over the course of the six hearings, residents provided hours of testimony and volumes of written comments.

The Los Angeles County Board of Supervisors adopted a Community Standards District in 2008 that limited drilling to 600 new wells and required a landscaping plan, the formation of a community advisory board and multi-agency coordination council, and the installation of new air quality equipment among more than 62 pages of regulations.

In order to address shortcomings in the adopted rules, four lawsuits were filed, including one on behalf of Community Health Councils and the Natural Resources Defense Council. An agreement was reached that significantly strengthened restrictions by further reducing the number of new wells allowed, increasing air quality monitoring, setting more stringent noise limits, and requiring recurring health and environmental justice assessments. With these provisions, the Community Standards District contains many elements that are a model approach for how health-protective and community-responsive mechanisms can be required of oil operations.

MAP 8: Land use surrounding the Inglewood Oil Field located adjacent to Baldwin Hills and Culver City



(Data from Southern California Association of Governments 2008).



Charles Zacharie and other neighbors are working to limit oil field expansion.

Nevertheless, community members remain concerned and vigilant. While greatly reduced in frequency, odor complaints continue, noise levels remain problematic, and people are concerned that cracks in their foundations might be caused by the oil field. The Baldwin Hills Community Standards District is currently going through a periodic review process that is required every five years, and Greater Baldwin Hills Alliance stakeholders have recommended improvements, including better implementation of rules and health studies, and further efforts to shrink the field’s size. Residents also want an emergency fund to guarantee the field is eventually cleaned up and to ensure resources are available if people’s health is harmed.

John Kuechle and Charles Zacharie feel that the Community Standards District has brought needed attention to the oil field and that the operators are being watched more closely now. But the questions about the health effects of living so close to such a large, active oil field remain. “Just because the oil company brings jobs and other benefits doesn’t mean it can do it at the expense of my health and well-being,” said Charles.



OIL DRILLING AND THE LAW: THE BASIS FOR MUNICIPAL AUTHORITY

Freeport-McMoRan oil operations tower over the surrounding neighborhood at the Jefferson Drill Site.

Adrian Martinez, *Attorney, Earthjustice*

Yana Garcia, *Staff Attorney, Communities for a Better Environment*

Angela Johnson Meszaros, *General Counsel, Physicians for Social Responsibility – Los Angeles*

The Los Angeles Oil Code applies to all districts where the drilling of oil wells or production from wells of oil, gases, or other hydrocarbon substances is permitted (Los Angeles City Municipal Code).

The Los Angeles Oil Code's primary concerns are to advance the interests of oil and gas producers, rather than promote public health and environmental protection. Importantly, these laws were last significantly updated in the 1950s, which predated many of California's landmark laws aimed at protecting residents from environmental harms, including the California Environmental Quality Act and the Porter Cologne Water Quality Control Act. Moreover, it predated passage of bedrock federal environmental laws like the Clean Air Act and Clean Water Act.

Recent evidence about the real and important impacts on residents and the environment from oil and gas development make this a good time to revisit the code to make sure it addresses the full ambit of local needs, including protecting the health and welfare of those living next to current and future oil and gas operations. In crafting these policy prescriptions,

the current regulatory scheme suffers from several flaws, but most importantly the following:

- From the start, the laws and regulatory oversight processes established to address oil and gas activity were not envisioned as a way to protect residents or the environment;
- As Los Angeles became more dense, the city failed to address gaps in the existing regulatory system, and it failed to create a framework for reviewing earlier decisions to allow or place conditions on oil extraction activities;
- The systems for collecting and making publicly accessible existing information about oil extraction activities are inadequate because the most critical information is incomplete and reporting is not timely.

All three of these flaws can be addressed through revisions to the municipal code.

California courts have a long history of zealously protecting the rights of cities to protect their residents through land use controls.

Overall, the City retains ample jurisdiction to implement the policy prescriptions provided in this report. Comprehensive zoning has long been held as a valid exercise of a city's police powers (*Miller v. Board*). The evidence of the serious impacts this industry imposes on residents, in addition to harms to the environment that are antithetical to the City's sustainability goals, provide the basis for changing the Los Angeles Oil Code to be more responsive to the needs of residents. The City will simply need to ensure it complies with legal precedent and provides adequate safeguards to protect vested rights. While this task will take some effort and resources, the seriousness of the threats posed by oil and gas extraction merits this work.

Opponents of commonsense measures to protect public health and the environment from oil and gas development will likely raise two legal claims to seek to derail these efforts. First, they may argue that these laws are preempted by state laws. Second, they may argue that any restrictions amount to a taking and could infringe on vested rights. Both of these issues lack merit.

On the preemption issue, California courts have long upheld reasonable local zoning regulations even in the context of restrictions on oil and gas (*Beverly Oil Company*). In the *Beverly Oil Company* case, California's Supreme Court determined "[i]t must be deemed to be well settled that the enactment of an ordinance which limits the owner's property interest in oil bearing lands located within the city is not of itself an unreasonable means of accomplishing a legitimate objective within the police power of the city" (*Beverly Oil Company*, 558). The City's action at issue in the *Beverly Oil Company* case allowed for continued oil operations at a site in the city but "expressly provide[d] that no new well for the production of hydrocarbon substances, which is a nonconforming use, shall be drilled nor shall existing wells be deepened" (*Beverly Oil Company*, 555). The Court upheld the City's action restricting operations by noting "[i]t has not been denied the right to extract the mineral wealth underlying its property, which denial has been upheld in other cases" (*Beverly Oil Company*, 559). As the California Supreme Court has clearly stated, cities retain authority to adopt a wide range of policy prescriptions to address the harms of oil and gas development.

Oil industry lobbyists may also argue that existing California law, including amendments through Senate Bill 4, preempts any activity by the City. Importantly, Senate Bill 4 did not expressly preempt local actions, and there

is no other evidence in California law that the State intended to preempt the rights of local jurisdictions to protect their residents through reasonable land use restrictions. The City will need to use the ample evidence contained in this report and other resources to provide the rationale for action, but California courts have a long history of zealously protecting the rights of cities to protect their residents through land use controls.

On the takings issue, the Fifth Amendment to the United States Constitution provides that "private property [shall not] be taken for public use, without just compensation" (U.S. Const., amend. V). The California Constitution contains a similar provision: "Private property may be taken or damaged for a public use and only when just compensation, ascertained by a jury unless waived, has first been paid to . . . the owner." (Cal. Const., art. I, sec. 19) Despite the fervor in which oil and gas proponents argue takings claims are a serious threat to a city's effort to enact zoning regulations, law professors from Stanford University, University of California Irvine, University of California at Berkeley, and University of San Diego School of Law articulated the uphill battle that a takings challenge would have in succeeding in a local control effort that took place in Santa Barbara County (Sivas 2014). Specifically, they articulated that a "facial" challenge to a local ordinance restricting certain types of oil and gas development would face an uphill battle in court. In addition, the law professors articulated the rigorous proof an individual property owner would need to provide in any "as applied" challenge against a city. This letter articulates clearly that a local entity like the City of Los Angeles can design a program that carefully navigates the issues related to takings and vested rights.

Proponents of unfettered oil and gas drilling in Los Angeles will claim legal issues impede any commonsense restrictions aimed at protecting residents and the environment from the harms associated with oil and gas development. These lobbyists and lawyers are wrong. The traditional role of a municipality's land use authority is to protect residents from harm. To date, the City of Los Angeles has built its laws based upon a paradigm that sought to maximize oil extraction—placing the interests of the oil industry over those of hardworking women and men, schoolchildren, and the elderly. To protect human health and the environment and to position itself at the forefront of a 21st-century approach to energy production and use, the City must shift to a paradigm that places citizens' health and welfare first. Los Angeles must be careful to craft commonsense protections based on evidence, but that hurdle is perfectly manageable.



TOWARD A HEALTHY AND SUSTAINABLE LOS ANGELES

Michele Prichard, *Director, Common Agenda, Liberty Hill*

A panoramic view looking towards downtown Los Angeles.

It is clear from the communities profiled here that expanded oil extraction operations—the first step in a long chain of oil production, transport, refining, and burning with documented deleterious health hazards at every stage—require urgent and decisive action by policy makers.

Regulators and lawmakers at the municipal, regional, state, and national levels all have a critical role to play in protecting the health and safety of residents. Yet, the involvement of so many different actors is one of the key challenges that have frustrated residents' efforts to get answers as oil-drilling operations expand and incorporate more hazardous techniques alongside conventional practices. As the community stories told here demonstrate, local residents often do not know to whom to turn for relief and response. Frequently, they have been shuffled between multiple offices in frustrating attempts to find the responsible agency.

There is a wide range of policy, zoning, regulatory, and enforcement tools to be considered by the many different agencies that have some jurisdiction and legal authority over oil operations in Los Angeles. Even a recent report by the L.A. Department of City Planning notes that “there is significant room for improvement in the way the City currently regulates and administers oil and gas activity” (Los Angeles Department of City Planning 2014).

The following section, while not exhaustive, highlights potential policy options that could provide greater public health and safety protections, more effective agency oversight, and a more accountable and open public process around current land use, permitting, and zoning practices concerning oil development. Here we distinguish between two major approaches: a “preventive” approach represents a fundamental shift to protecting public health by eliminating known hazards; a “mitigation” approach, on the other hand, seeks to reduce (but not eliminate) health hazards.

POLICY OPTIONS TO PROMOTE PREVENTION

Mounting scientific and public health evidence indicates that the toxic chemicals and related air emissions that accompany oil development—in both its conventional and enhanced forms—are hazardous to human health. Eliminating exposures to these hazardous chemicals is a primary prevention, providing the broadest, population-level health protections, especially for vulnerable populations with heightened sensitivity to such exposures, including children, pregnant women, the elderly, those suffering from chronic health problems, and low-income communities of color who

face a “double jeopardy,” impacted by multiple sources of pollution and socio-economic stressors (Morello-Frosch 2009). The following strategies represent significant departures from current philosophy and practice, in which communities often shoulder the burden of demonstrating harm, and they offer alternatives that promote precautionary action with the goal of preventing illness and injury and creating healthier communities.

STRATEGY #1: Prohibit Oil Drilling and Production Activities within Buffer Zones

Exposure to hazards can be significantly reduced by establishing a distance separation or setback—commonly referred to as a “buffer” zone—from homes, schools, businesses and other sensitive land uses. This form of community protection is already utilized locally and nationally. City Council leaders in Dallas set a precedent, recently approving a municipal ordinance requiring a 1,500-foot setback of oil drilling operations from residential and other sensitive land uses (City of Dallas 2013). Closer to home, the South Coast Air Quality Management District (SCAQMD) established a 1,500-foot radius for purposes of air monitoring and responding to odor complaints from oil drilling operations with a heightened level of response time and corrective action (SCAQMD 2013). The State of Colorado requires a public hearing before a well can be drilled within 1,000 feet of a high occupancy building, and the State of Maryland observes a 1,000-foot setback for oil wells (Richardson et al. 2013). Similarly, more than a decade ago, the California Air Resources Board issued recommendations to municipalities for health-protective buffer distances between sources of toxic air emissions to protect residential and sensitive populations (CARB 2005).

The alarming reports of severe health impacts in neighborhoods like University Park and Wilmington, and residents’ concerns about safety from hazardous operations like those in Historic West Adams, provide significant merit to the concept of buffer zones that would separate these industrial sites from residential and sensitive land uses. In addition, the use of diesel trucks and unsightly diesel-powered equipment in neighborhoods poses another detriment to public health and the quality of life. The most precautionary approach would restrict—or even prohibit—both new and current oil extraction operations inside of the buffer zone, thereby better protecting the health and quality of life of adjacent neighborhood residents. Furthermore, a strong case can be made for a 1,500-foot buffer zone to provide for maximum safety, based on the precedent set by the City of Dallas and the SCAQMD’s current monitoring practice.

STRATEGY #2: Establish Moratoriums, Interim Control Ordinances, and Bans on Hydraulic Fracturing and Other Well Stimulation Techniques

The City of Los Angeles has a number of planning tools available to restrict specific types of land uses, including moratoriums, interim control ordinances, and outright bans. In February 2014, a motion was

introduced to place a moratorium on the practice of hydraulic fracturing (or “fracking”) and related extraction technologies such as acidization, gravel-packing, and the use of waste-disposal injection wells. The proposal asserts that until it can be demonstrated that these methods do not pose environmental or health hazards, these types of operations should cease. While the SCAQMD’s recent data shows a limited number of “fracking” incidents in the region, and none in the City of L.A. since June of 2013, the practice of acidizing wells and performing acid treatments of wells (also called “maintenance acidizing” by oil operators) is far more common and a cause for concern, especially for the residents who live and work near such sites (SCAQMD 2014). The proposed moratorium, especially if expanded to cover all forms of well activities, including acidization and maintenance acidizing, represents a preventive and health-protective approach that deserves serious consideration and public discussion.



Diesel trucks operate next to homes, emitting air toxics known to cause cancer.

Similar to a moratorium, an Interim Control Ordinance (ICO) is a planning tool that temporarily restricts a specific land use when there is concern about environmental or human health and safety hazards. With a general duration of six months, ICOs provide decision-makers with the time required to study an issue and recommend permanent and responsible land use solutions. For example, ICOs have been used to limit the establishment of medical marijuana retailers and fast-food restaurants, on the grounds that these land uses are over-concentrated in certain neighborhoods and pose a risk to public safety, community health, and quality of life. In the Wilmington-Harbor City Community Plan Area adjacent to the Port of L.A., an ICO was issued to halt the establishment and expansion of open storage yards that caused multiple neighborhood nuisances (e.g., dust, odors, vermin) until more permanent regulations could be drafted and instituted.

The use of diesel trucks and diesel-powered, unsightly equipment in neighborhoods poses another detriment to public health and the quality of life.

While the proposed City of Los Angeles moratorium implies a future end-point when a decision will be made based on scientific analysis, many municipalities have already implemented outright bans or permanent abolition of specific forms of oil production activities. In a high profile decision in December 2014, New York State Governor Andrew Cuomo announced a ban on hydraulic fracturing based on a State Department of Health report that cited “the weight of evidence from the cumulative body of information . . . demonstrates that there are significant uncertainties about the kinds of adverse health outcomes, and the likelihood of the occurrence of adverse health outcomes . . .” (New York State Department of Health 2014). Voters in communities throughout the country and state have taken to the polls to approve similar measures. Voters in the City of Denton, Texas approved a November 2014 ballot initiative to ban all hydraulic fracturing within city limits (Hennessy-Fiske 2014). In California in November 2014, voters in San Benito County approved a ban on well stimulation and enhanced recovery methods such as fracking and steam injection. San Benito’s measure also imposed a ban on any new gas or oil drilling in areas zoned as residential or rural land uses (Cart 2014).



Maintenance trucks post signs indicating that they are transporting hazardous chemicals.

STRATEGY #3: Expand Role and Authority for Public Health Analysis in Permitting Process

Increasingly, community health is a primary consideration in local planning and land use decision-making. A growing body of evidence demonstrates that social, economic and environmental factors play an

important role in determining the health status of populations. Poverty, unemployment, lack of access to healthy food and open space, and exposure to a variety of environmental contaminants all contribute to overall health at both the individual and community levels. The recent adoption of the Health and Wellness Element for inclusion in the City of Los Angeles’ General Plan provides a powerful rationale for utilizing a public health framework for policy analysis, development, and decision-making related to oil drilling in Los Angeles.

Engage the Los Angeles County Department of Public Health in permitting decisions.

Currently, the L.A. County Department of Public Health (DPH) oversees public health for both the City and County of Los Angeles. While DPH currently does not have a role in the approval of oil-drilling permits, it has recognized the adverse health impacts experienced by residents near the Allenco site. DPH’s Preliminary Environmental Health Assessment report dated December 3, 2013, found that, “Petroleum-based compounds and associated odors from the Allenco facility are affecting the health and well-being of the adjoining community” (County of Los Angeles Department of Public Health 2013).

Angelo Bellomo, Director of Environmental Health for the Department, notes that “existing regulations do not adequately consider the risk to public health. The current regulatory system is inadequate, with many urban oil-drilling sites too close to sensitive land uses. We need to ensure the potential health impacts of proposed drilling sites are considered early on in the decision-making process” (A. Bellomo, personal communication 2014). Currently, the Department plays a “downstream” role in assessing and responding to health complaints from oil drilling, rather than an “upstream” role to ensure public health and safety through proactive prevention strategies. Upstream efforts that DPH could undertake include, but are not limited to: informing residents, policy makers and the media about health risks and protective policies associated with locating oil drilling adjacent to residential neighborhoods; and playing an advisory role in advance of project siting decisions.

Require Health Impact Assessments for new and expanded oil operations.

Health Impact Assessments (HIAs) are gaining significant attention as an effective way to bring a comprehensive public health framework to the evaluation of direct and indirect impacts of proposed land use projects



The view from a kitchen window of oil drilling operations next to homes at the Jefferson Drill Site in Historic West Adams.

and policies. HIAs have grown in use, particularly in vulnerable community project contexts, since they fill critical gaps left by current regulatory tools. HIAs have been conducted on a wide range of projects (e.g., housing, transportation, and major development projects) and policies (e.g., educational and social policy reforms) in order to better understand the full range of health benefits and risks related to air quality, noise, public safety, local business environment, mobility, jobs, etc. HIAs help decision-makers determine whether to proceed with a project, and if so, how best to mitigate its negative impacts. In the L.A. region, HIAs have been conducted and/or are being considered on the proposed Farmers Field stadium, the Long Beach Downtown Plan and Housing Element, and the I-710 expansion, to name a few. Given the potential for significant human health impacts, new and expanded oil-drilling activities should undergo Health Impact Assessments to document the risks alongside potential benefits. There is also a compelling case to be made for conducting HIAs on existing oil-drilling activities, given that many sites were authorized decades ago, when we had limited knowledge of the adverse health impacts of many pollutants already used. Especially in neighborhoods which have become more densely populated over time, while activities, technologies and the use of chemicals have significantly changed and intensified, it is imperative to have a complete picture of the current health, environmental, noise, public safety, job, and local business impacts associated with oil-drilling activities.

Recommended Performance Standards

- Require Environmental Impact Review and Health Impact Assessment for all projects applying for new wells, modified wells, and well expansion.
- Mandate the most protective measures in pollution prevention, best engineering practices, leak detection, Best Available Control Technology and Best Available Retrofit Control Technology.
- Limit the number of wells.
- Limit the hours of operation.
- Install enclosures or other technologies to trap fugitive emissions.
- Implement continuous monitoring of and reporting on emissions, air quality, and noise levels with results made publicly available and regularly reviewed by SCAQMD and DPH; thresholds should be set for when to investigate for leaks and equipment problems, and for when to cease operations until corrected.
- Develop emergency response plans, with plans for reassessment and upgrades.
- Issue protective warnings and notifications on-site, including posting of planned maintenance schedules so that sensitive populations can take precautions.
- Review periodically conditions, proper compliance, and the feasibility of improving operations at all sites.
- Implement long-term surveillance, monitoring, and reporting of health impacts among residents living adjacent to sites by DPH, including the addition of a question about proximity to oil wells in their current survey of Key Indicators of Health by Service Planning Area.
- Require a super-majority (e.g., 2/3) vote to approve any variance from standards by area or citywide commissions.

Exposure to hazards can be significantly reduced by establishing a distance separation or set-back—commonly referred to as a “buffer” zone.

Recommended Inspection, Monitoring, and Enforcement Practices

- Establish an Ombudsperson Office where all permitting, regulatory and enforcement entities can regularly coordinate on all aspects of oil drilling approvals, complaints, and compliance issues.
- Increase the frequency of unannounced inspections with costs to be defrayed through a fee structure borne by site operators.
- Increase air quality, water quality, and noise monitoring and testing, along with reporting and transparency about all emissions, including both routine and accidental leaks.
- Improve the response time and protocols of regulatory agencies to residents' complaints (especially fence-line neighbors), including ongoing efforts to update and strengthen SCAQMD rules 1148.1 and 1148.2.
- Require inspectors to bring appropriate air-quality testing equipment whenever responding to complaints on oil-production activities.
- Increase agency accountability and follow-through in response to residents' complaints and concerns, with specified next steps and clearly stated deadlines for corrective action.
- Use SCAQMD authority to impose heavy fines and penalties on serial violators, including increased fees to allow for more comprehensive inspection and enforcement.
- Use SCAQMD authority to deny permit renewals for serial violators.

POLICY OPTIONS TO MITIGATE PUBLIC HEALTH IMPACTS

In addition to strategies that seek to prevent health risks, there are many policy options that can mitigate and reduce current and potential health and safety concerns for residents. These mitigation strategies and safeguards would offer key public health benefits to residents affected by neighborhood drilling.

STRATEGY #1: Strengthen Performance Standards for Special Oil Districts

The City of Los Angeles has established Oil Districts (known as “O” Districts) in the Los Angeles Municipal Code Section 13.01. These are special geographic “overlay” zones with specific rules to govern oil drilling and production operations. The Department of City Planning’s November 5, 2014 report notes that “Many of Section 13.01 provisions were established in the Code prior to the passage of the California Environmental Quality Act in 1970; therefore, they do not reflect current mandated environmental review requirements.” In fact, the report describes how many of the

current oil and gas regulations were established as early as the 1940s and 1950s. After review of the “O” Districts, the L.A. Department of City Planning stated, “Updates to the code section have not kept time with the changing industry, economy, urban environment, or the City’s evolving information management strategies” (Los Angeles Department of City Planning 2014). With most of the provisions of the “O” District standards now decades old, new regulations to govern future oil development are desperately needed. Moreover, a comprehensive review of all existing “O” District boundaries and compliance with permitting standards and/or conditional use permits would be prudent. Drilling sites that have introduced changes in operations since their original permit approvals should be reevaluated by regulatory authorities based on existing operations rather than grandfathered in under old permits.

STRATEGY #2: Strengthen Comprehensive Inspection, Monitoring and Enforcement

A patchwork of regulatory and permitting authorities contributes to confusion, delays and lack of responsiveness to resident concerns.

Are we ready to spur innovation towards a just transition to a clean, renewable, and safe energy future?

Especially as the industry adopts new, advanced technologies to increase oil production at locations originally permitted long ago, it is critical that oversight be systematic and coordinated to ensure that the health and safety of residents are safeguarded. The current situation is riddled with gaps in jurisdiction, legal authority and poor enforcement of inadequate regulations, resulting in delayed responses, conflicting information, and inaction around resident concerns.

STRATEGY #3: Strengthen Transparency, Information Access and Public Engagement

Current information-sharing practices by local, regional, and state agencies for local residents are in need of serious improvement. Originally developed to respond to producers' concerns, transparency and public engagement measures are not responsive to the legitimate health and safety concerns of nearby residents and the community at large. While

procedures for community notification, information sharing, public participation, and input to the policy and regulatory process vary across agencies, pervasive deficiencies include the lack of any public hearing; insufficient advanced notice of permit requests; public hearings held at inconvenient times of day and at inconvenient locations for community residents; notifications and meetings in English only, excluding monolingual or bilingual residents; notifications shared only with a subset of impacted and concerned residents; lengthy advanced notice requirements for information requests by residents; and other barriers for accessing information (such as the requirement to access information only during standard business hours). And while recent legislation, most notably California State Senate Bill 4, has improved industry reporting and the accessibility of information by the public, the use of the "trade secrets" provision to prevent disclosure of the chemicals used in oil drilling and production is very troubling (California Senate Bill 4, 2013).

Recommended Transparency, Information Access, and Public Engagement Practices

- Expand citizen oversight and/or inclusion in review panels.
- Increase the advanced notice of public meetings (to a minimum of one month).
- Share meeting notices with property owners and residents, including renters, living or studying within 1,500 feet of an oil extraction site.
- Provide all notices in English, Spanish and other appropriate languages, and make appropriate translation available at all public meetings; provide interpretation for neighborhoods where other languages are commonly spoken.
- Hold meetings on evenings and weekends when residents are not as likely to be at work.
- Hold meetings in the impacted community (rather than at more remote agency offices).
- Schedule appointments with residents who wish to obtain records during non-business hours to accommodate resident work schedules.
- Reduce the advanced period for residents to request information to one week or less.
- Require permit applicants to provide full disclosure of all chemicals and processes used in oil drilling and production operations.
- Continue work to amend SCAQMD Rules 1148.1 and 1148.2 to ensure that reporting and notification requirements are strengthened for oil drilling, maintenance, and production wells, and ensure that complainants receive follow-up analysis and reports on corrective action from SCAQMD and other agencies.



An aggressive commitment to rooftop solar installations in Los Angeles will expand the local economy, accelerate the transition to clean energy, and lead to dynamic job growth.

TOWARD A HEALTHY AND SUSTAINABLE LOS ANGELES

This report highlights the changes in the oil drilling and development landscape that have taken place in Los Angeles since the original permitting of many older pumps. In many instances, drilling operations now take place directly adjacent to residential neighborhoods and sensitive land uses. Many of these areas are densely populated with high proportions of low-income residents, people of color, and renters. These communities also bear disproportionate pollution exposure burdens that make them more vulnerable to the health hazards resulting from oil-drilling operations.

The City of Los Angeles has emerged as a leader in adopting far-reaching environmental, land use, and public health policies. Innovative sustainability policies at the city's proprietary agencies—the Port of Los Angeles, the Los Angeles World Airports, the Department of Water and Power—as well as recent initiatives such as the aforementioned Health and Wellness Element, Mayor Garcetti's Sustainable City pLAN and Re:Code LA (a five-year initiative to systematically update and revise the city's outdated zoning code) represent opportunities for rethinking the way that the City governs planning and land use activities that directly impact the quality of life and well-being of residents and businesses.

Similarly, the State of California has demonstrated unprecedented leadership in setting ambitious and visionary goals to affect climate change by significantly reducing greenhouse gas emissions from fossil

fuels. The Global Warming Solutions Act of 2006, along with a suite of other innovative policies for investing in carbon reduction strategies that can also deliver social equity and economic development benefits, is breaking new ground in the fight to address climate change. Recent carbon-reduction targets announced in early 2015 by the Governor and other Legislators for 2030 and 2050, and highlighted in Mayor Garcetti's Sustainable City pLAN, promise to accelerate the pace of change.

We are on the threshold of a decisive moment: Will we perpetuate land use and energy policies which support the expansion of a dirty, fossil-fuel based economy with damaging health, neighborhood, and environmental consequences?

Or, are we ready to spur innovation towards a just transition to a clean, renewable, and safe energy future—not only through investments in energy and water conservation, mass transit, and solar generation—but through a reformed land use policy which recognizes and limits the resulting health inequities and quality of life burdens suffered by far too many of its inhabitants?

Now is the time to engage in that public discussion.

The time has come to move toward a preventive approach that protects human health while advancing us towards a renewable, clean, sustainable, and green economy.

Sustainability Policies Passed by the City of Los Angeles and Proprietary Agencies

CITY DEPARTMENT/AGENCY	PROGRAM TITLE	LINK TO DOCUMENTS
Port of Los Angeles	Clean Air Action Plan & Clean Truck Program	http://www.cleanairactionplan.org/
Los Angeles World Airports	LAWA Sustainability Plan	http://tinyurl.com/LAWA-Sustainability-Plan
Los Angeles Department of Water and Power	LADWP Sustainability Plan	http://tinyurl.com/LADWP-Sustainability-Plan
Los Angeles Department of City Planning	PLAN for a Healthy Los Angeles	http://healthyplan.la/
Office of Mayor Eric Garcetti	Sustainable City pLAn	http://plan.lamayor.org/

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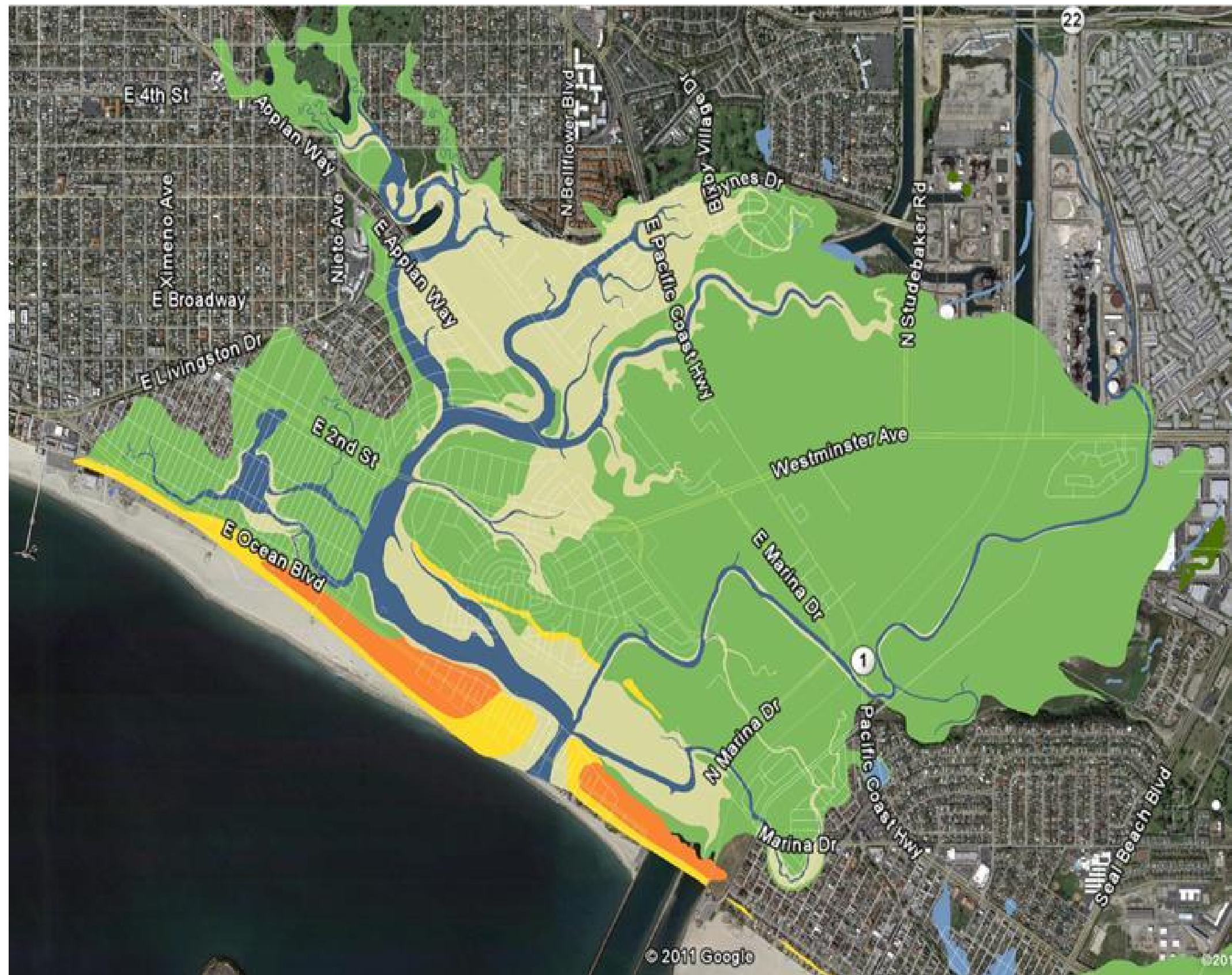
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Can the Los Cerritos Wetlands survive The Los Cerritos Wetlands Restoration and Oil Consolidation Project?



a presentation by Protect the Long Beach/Los Cerritos Wetlands



At one time 2400 acres of lagoons, bays, tidal salt marshes and alkali meadows formed the estuary of the San Gabriel



This vast wetlands sustained the Tongva coastal communities of Puvungna and Motuucheyngna

The Los Cerritos Wetlands are sacred to the Tongva and Acjachemen who follow the teachings of Chinigchinich, lawgiver and god, originating from Puvungna. They will continue to oppose the removal of their ancestors and the disappearance of their history that will result from this oil drilling project.



“Respect should be given those indigenous nations who still carry on their ceremonies, still following the ancient laws of nature” Lillian Robles, Acjachemen Elder



This 1921 photo, taken before the San Gabriel River was channelized, shows the river crossing a unified Bolsa Chica and Los Cerritos Wetlands and entering the Pacific Ocean through Anaheim Bay.



Today the Los Cerritos Wetlands have been reduced to 500 acres of open space managed by the Los Cerritos Wetlands Authority. While the area has been degraded by industrial use, it still has both fresh and salt water marshes and wetlands habitat supporting local wildlife

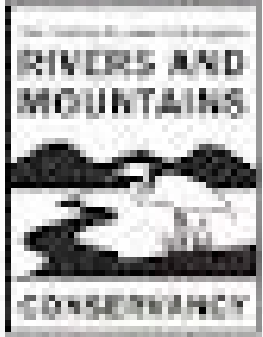
LOS CERRITOS WETLANDS

Los Cerritos Wetlands Authority

In February of 2006, a joint powers agreement was adopted among the:

Rivers & Mountains Conservancy, State Coastal Conservancy,
& Cities of Long Beach & Seal Beach


=






Los Cerritos Wetlands Authority

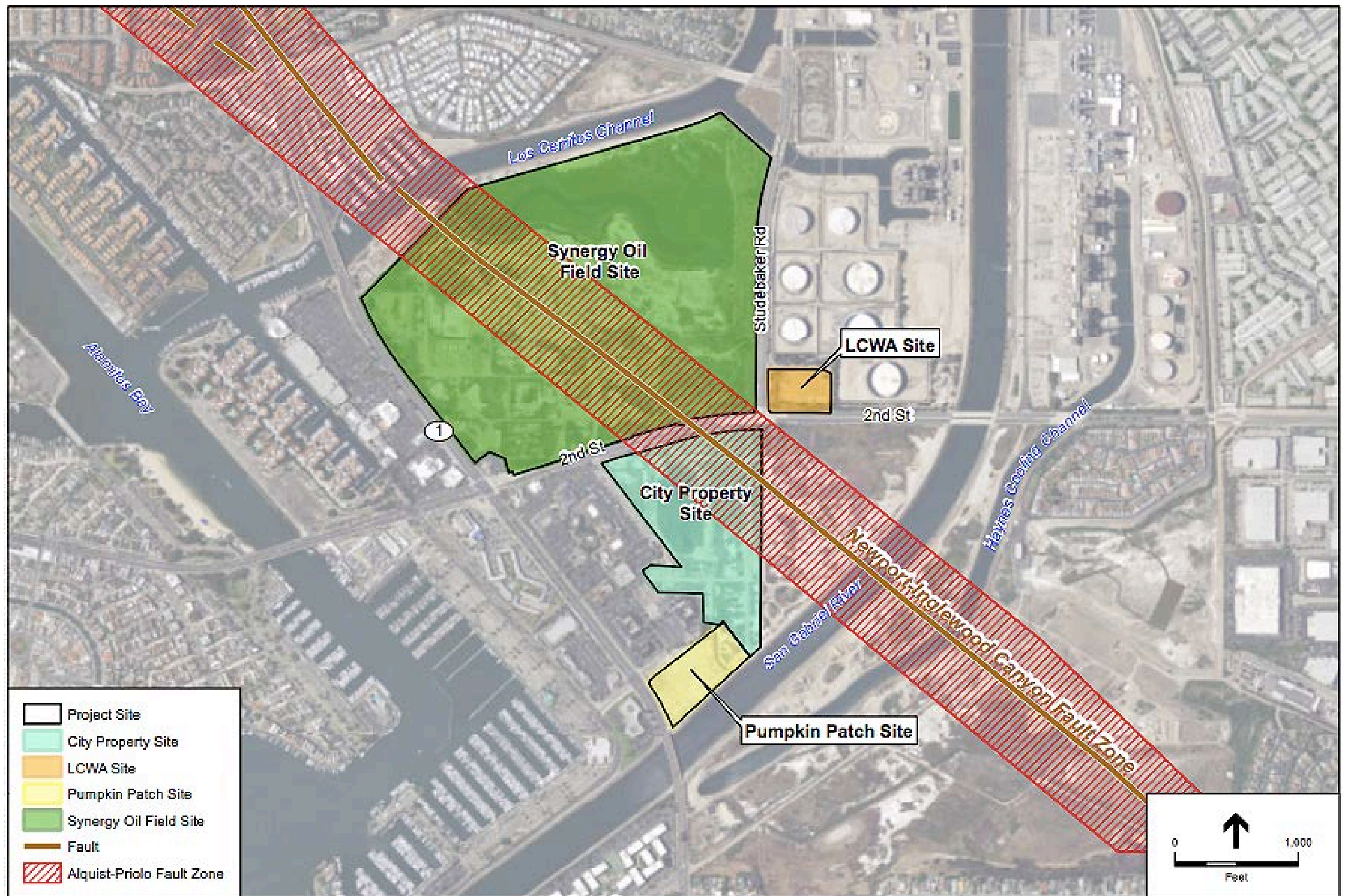
Coastal Conservancy

These agencies comprise the project's Steering Committee

So what exactly is The Los Cerritos Wetlands Restoration and Oil Consolidation Project?



Each Oils Minerals Partners and the Los Cerritos Wetlands Authority say that their oil drilling project will restore the degraded Los Cerritos Wetlands by relocating oil operations and removing old drilling rigs, pipes, and storage tanks.



The Project area consists of four sites within, or adjacent to, the Los Cerritos Wetlands which are bisected by the Newport-Inglewood Fault

Pretty Pictures and Promises sell oil extraction as Wetlands Restoration



"Mother Nature needs our help, and yours. At the core of the Project is a passionate commitment to the environment. This rare opportunity makes what's previously been impossible—possible: to restore the wetlands with proper planning and a commitment to restoration funding" BOMP

Remove all existing oil wells and equipment from Synergy and City sites within 40 years

Establish mitigation bank to fund partial restoration of Synergy property

Restore and revegetate Synergy property as oil wells and oil production facilities are removed

Establish visitors center, parking, bike and walking trails on wetlands

Transfer ownership of the Synergy property to LCWA in exchange for lot at 2nd & Studebaker

What are they actually going to do and what are the risks?



California Coastal Commission staff has stated that calling this project “wetlands restoration” and “oil consolidation” is “misleading” to the public; further commenting that “the *expansion* of oil extraction and processing operations at the Synergy Oil Field” is the actual goal.”

“Restoration” projects are often the “feel good” means by which developers win permission to do other environmental



business, but not for the environment. And it is big business: \$70 billion for wetlands restoration projects in North America in the past 20 years. “Restoration” of the Los Cerritos Wetlands, including high berms, bulldozing, construction, and herbicides to kill “invasive” species, will destroy existing homes and food sources of wildlife. Plans for a visitor’s center, parking lot, bike and walking trails will offer “public access” but enlarge the human footprint at the expense of the environment.



Developers continue to ignore California Indians, “mitigating” the destruction of sacred sites by removing and storing “artifacts” for research by archaeologists. Public agencies maintain close relationships with developers while failing to consult with all affected tribal groups as required by law, resulting in a pattern of environmental racism.

Expansion?

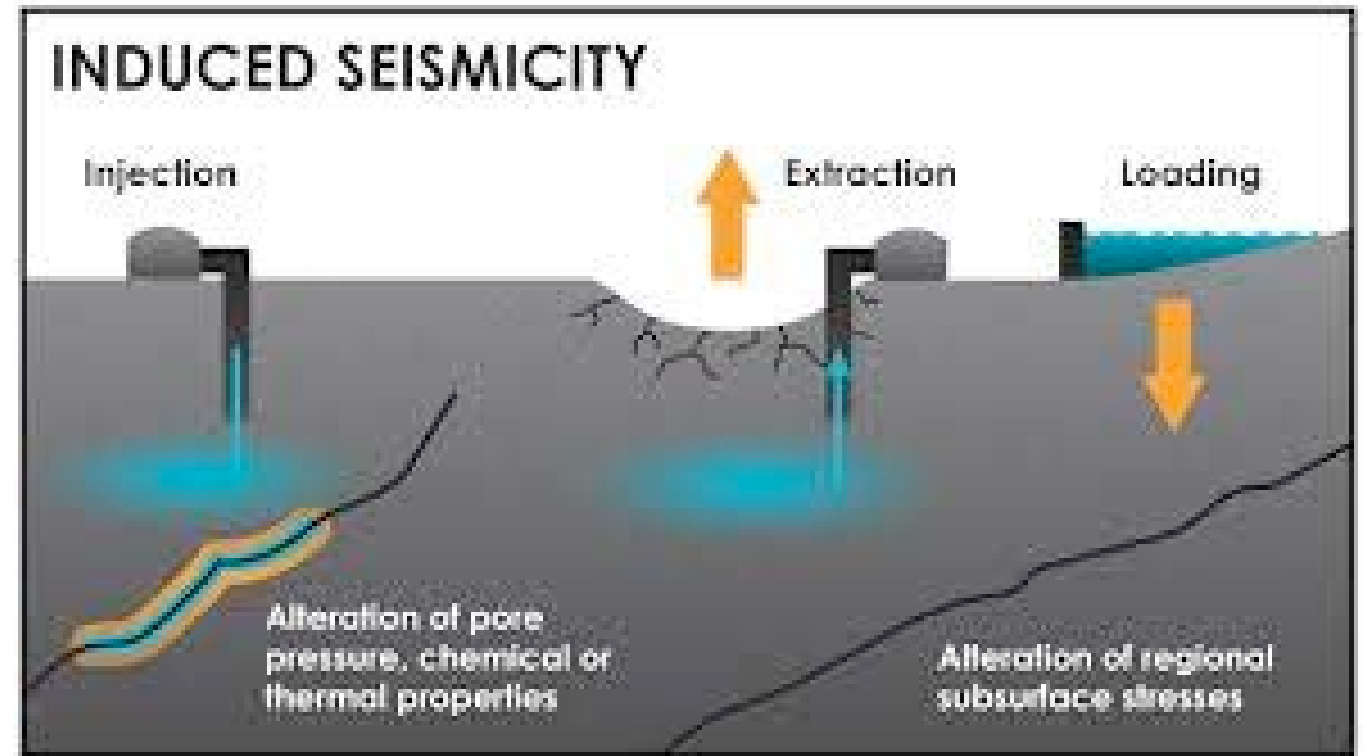
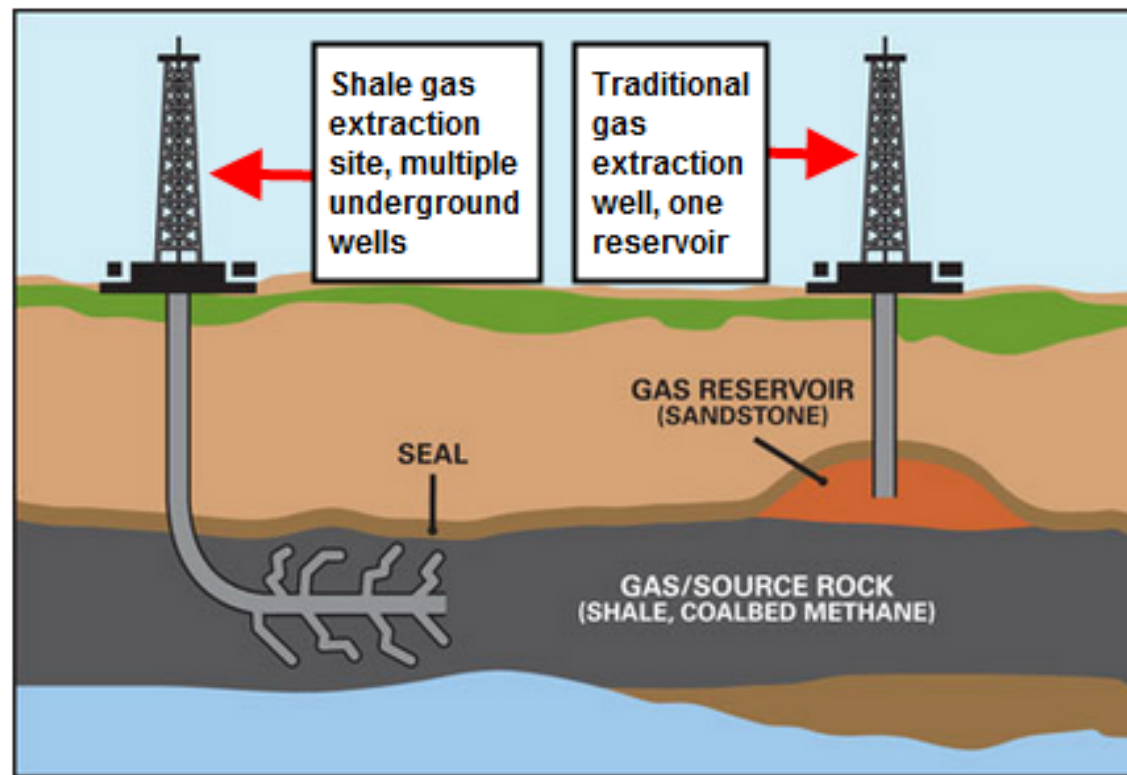


Beach Oil Minerals Partners retains the mineral rights to the Pumpkin Patch,

LCWA, City of Long Beach, and Synergy sites and plans to construct:
a 2,200 ft. pipeline crossing the earthquake fault on the city-owned wetlands,
a 160 ft. high drilling rig, a 120 ft. high workover rig, three well cellars with 50
new oil, water injection and water source wells, water treatment and oil
separation systems, a 3,000-barrel oil tank, a 2,000-barrel “skim oil” tank, a
warehouse and office building on the Pumpkin Patch site,
three well cellars for 70 new oil and water source wells, a 120 ft. high
workover rig, a 25 ft. high ground flare for methane gas, an elevated pipe
rack, an energy system microgrid, a 28,000 barrel oil tank, a 5,000-barrel
injection water tank, and two 14,000-barrel multi-use tanks on the LCWA
site.

Modern? yes - Safe? **NO**

The shale oil and gas boom has brought the oil industry roaring back to life. In the Los Angeles basin companies are now extracting oil using “enhanced” drilling techniques such as acidizing, hydraulic fracturing, and “directional drilling,” going down vertically thousands of feet below the surface and then horizontally for miles.



- New “directional” drilling extending under the wetlands and surrounding local areas
- “Enhanced” drilling methods using the same toxic chemicals as fracking
- Billions of gallons of water injected under pressure to remove & replace oil
- Wasting and polluting water in California during the worst drought in 1200 years
- Extraction of 200 million barrels of oil, increasing global warming & sea rise



Not if, but when. Oil spills and earthquakes will happen, losses cannot be prevented. The fossil fuel industry continues to exploit vulnerable communities, leaving a trail of environmental disaster in its wake. We are considered disposable, just another tax write off!

WHAT ARE THE RISKS OF THIS PROJECT TO NEIGHBORING COMMUNITIES?



Beach, Earthquakes on the fault line triggered by drilling operations
Island Village, Leisure World, and other neighborhoods could be
facing:
Accidents and pipeline leaks that release oil and toxins
Contamination of wetlands, waterways and ocean beaches
Poor health, lower property values, loss of revenue from tourism

“The process is geared to getting to yes. We look at what’s being proposed by the applicant, and we do our best to make the applicant’s project feasible.”

Do we accept the status quo and wait for help when disaster strikes?



Or act now to protect ourselves, our homes and our



Beach's Local Coastal Program to allow oil drilling on the Pumpkin Patch
and LCWA sites and NO to The Los Cerritos Wetlands Restoration and Oil
Consolidation Project

Contact Coastal Commission staff, attend the August meeting in Redondo
Beach and future Coastal Commission meetings where the project is on
the agenda.

#2

Contact your Long Beach or Seal Beach City Council member, your state
and federal representatives, and the local news media. Oil tax dollars are
not worth the risk of losing our wetlands and our quality of life.

#3

Educate yourself and others about the shale oil boom and the true cost of
fossil fuel extraction, global warming, and sea rise.

#4

Join and support organizations fighting this project and working to stop the
fossil fuel industry from destroying our communities.



Protect the Long Beach/Los Cerritos Wetlands is a coalition of tribal, environmental, and social justice organizations and concerned citizens saying NO to the Los Cerritos Wetlands Restoration and Oil Consolidation Project

Our goal is to stop the extraction of 200 million barrels of oil from beneath the Los Cerritos Wetlands and neighboring communities, putting them at risk.

Follow us on Facebook at *Protect the Long Beach/Los Cerritos Wetlands*

From: [Justin Balsz](#)
To: Energy@Coastal
Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)
Date: Monday, July 23, 2018 3:34:02 PM

No new drilling. Leave the oil in the ground where it belongs.

Sent from my iPhone

From: [Johntommy Rosas](#)
To: [Huckelbridge, Kate@Coastal](#); [Henry, Teresa@Coastal](#); [Teufel, Cassidy@Coastal](#); [Craig Chalfant](#)
Subject: Re: Outreach regarding the Beach Oil Minerals Partners Project in Los Cerritos Wetlands, Long Beach
Date: Monday, July 23, 2018 2:14:48 PM
Attachments: [image.png](#)

Please take formal NOTICE that TATTN is lodging its [OBJECTIONS AND OPPOSITION](#) the proposed Los Cerritos Oil Consolidation and Wetlands Restoration Project/ Beach Oil Minerals Partners Project in Los Cerritos Wetlands, Long Beach- based on the grounds listed in the previously sent email form us/TATTN

On Mon, Jul 23, 2018 at 1:41 PM Johntommy Rosas <tattnlaw@gmail.com> wrote:

Hi Kate -

1. TATTN/ I are suggesting that you please call and speak with Teresa Henry the CCC district manager in long beach-ASAP-TATTN is/have/has worked with Teresa on numerous projects including the Banning Ranch / Horizontal Development Oil Extraction Abandonment and Consolidation Project-her knowledge and expertise on these types of projects is crucial and should be sought by you /CCC -I know she is bizy but I am sure she can assist you on this project -
2. TATTN/JTR is requesting that the same "banning ranch protocol" be applied on this very similar proposed project -Los Cerritos Oil Consolidation and Wetlands Restoration Project.
3. And the same issues are currently unresolved at los cerritos which are the TRIBAL CULTURAL RESOURCE site locations and perimeters-which have to be known to legally and as required avoid all tribal cultural resources /sites there-There was a skull uncovered there and many sites listed/documented but remains incomplete and requires more testing by the STP'S process or small excavating equipment-
4. TATTN is hopeful the same CCC protocol is applied at los cerritos including the TCR testing and should happen before and decisions are made or considered - that should also include continued tribal consultation with the new CCC TRIBAL CONSULTATION POLICY -
5. if the CCC fails to implement the same "banning ranch protocol " at los cerritos - the result would be the CCC committing several violations to our rights and to numerous laws-
6. TATTN also advises and requests a continuance on the CCC hearing for this proposed project until the testing is completed and studied including the required tribal consultation with TATTN- including the TCR site delineations - that will clearly show where the projects potential negative adverse impacts would occur-
7. TATTN is also requesting that the CITY OF LONG BEACH request the continuance as well- that way TATTN and CLB can work out the required details for testing in cooperation and concurrence with CCC - TATTN has consulted on numerous projects with CLB's Craig Chalfant who is cc'd on this reply-

TATTN looks forward to your responses in a timely manner-
/s/ JOHNTOMMY ROSAS

LCW CASE EXHIBIT 34

19-000231	CA-LAN-231	Dixon 1961	Shell Midden
19-000232	CA-LAN-232	Dixon 1961	Shell Midden
19-000233	CA-LAN-233	Dixon 1961	Shell Midden with Lithic Arti-facts
19-000271	CA-LAN-271	Dixon 1959	Shell Midden (destroyed by oil well development)
19-000272	CA-LAN-272	Dixon 1961; Brooks, Conrey & Dixon 1965	Human Skull

On Mon, Jul 16, 2018 at 2:01 PM Johntommy Rosas <tattnlaw@gmail.com> wrote:

Sounds good, thank you.

On Mon, Jul 16, 2018 at 1:47 PM Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov> wrote:

Thanks for getting back to me so quickly. I would definitely like to hear your concerns and will look out for your letter.

Kate

From: Johntommy Rosas <tattnlaw@gmail.com>

Sent: Monday, July 16, 2018 11:57:24 AM

To: Huckelbridge, Kate@Coastal

Subject: Re: Outreach regarding the Beach Oil Minerals Partners Project in Los Cerritos Wetlands, Long Beach

Thanks Kate -

I have been observing the CLB process and they are way off on it-
but now I want to start weigh in on it -
their consultation is flawed -
I will send you my letter to them on our concerns and objections -
it should be done this week-
thanks jt

On Mon, Jul 16, 2018 at 11:11 AM Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov> wrote:

Hello! I am writing to you regarding the Los Cerritos Oil Consolidation and Wetlands Restoration Project. As you are likely aware, the City of Long Beach approved a Final EIR and permits for this project which is proposed by Beach Oil Minerals Partners (BOMP) and involves an expanded and consolidate oil production operation on two new sites in Long Beach and the restoration of the existing Synergy oil field to tidal wetlands over a 40 year period. I believe the City reached out to you as part of a tribal consultation process.

This project also requires approval by the Coastal Commission. This is a two-phase process. The first phase is a hearing on an amendment to the City of Long Beach's Local Coastal Program (LCP) which is currently scheduled for the Commission's August hearing (August 8-10).

The second phase will be a hearing on a Coastal Development Project for the BOMP project which is likely to be scheduled for later this year.

I am reaching out to you in advance of our scheduled hearing to see if you have any additional thoughts or concerns you would like to share with the Coastal Commission regarding this project and the proposed land use changes within the City of Long Beach. Please feel free to email or call me (at the number below) if you wish to discuss this project and the Commission's upcoming hearing or if you have any questions.

Thank you for your time and attention!

Kate Huckelbridge

Kate Huckelbridge, PhD
California Coastal Commission
Energy, Ocean Resources & Federal Consistency Division
45 Fremont St. Ste. 2000
San Francisco, CA 94105
415-396-9708



Every Californian should conserve water. Find out how at:

[SaveOurWater_Logo](#)



[SaveOurWater.com](#) · [Drought.CA.gov](#)

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JOHN TOMMY ROSAS
TRIBAL ADMINISTRATOR
TRIBAL LITIGATOR - TATTN JUDICIAL # 0001
TONGVA ANCESTRAL TERRITORIAL TRIBAL NATION
A TRIBAL SOVEREIGN NATION UNDER THE UNDRIP AND AS A TREATY [s] SIGNATORIES RECOGNIZED TRIBE, WITH HISTORICAL & DNA AUTHENTICATION ON CHANNEL ISLANDS AND COASTAL VILLAGES - AND AS A CALIFORNIA NATIVE AMERICAN TRIBE / SB18-AB 52-AJR 42-ACHP/NHPA - CALIFORNIA INDIANS JURISDICTIONAL ACT U S CONGRESS APPROVED MAY 18, 1928 45 STAT. L 602

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JOHN TOMMY ROSAS

From: [John Tommy Rosas](#)
To: [Huckelbridge, Kate@Coastal](#); [Henry, Teresa@Coastal](#); [Teufel, Cassidy@Coastal](#); [Craig Chalfant](#)
Subject: Re: Outreach regarding the Beach Oil Minerals Partners Project in Los Cerritos Wetlands, Long Beach
Date: Monday, July 23, 2018 3:00:45 PM
Attachments: [image.png](#)
[CCC HORIZONTAL NOI Letter and Appendix TATTN MARKUP 01 \(1\).pdf](#)

example of required conditions and NOI language -except for the approval

NOTICE OF INTENT TO ISSUE PERMIT

(Upon satisfaction of special conditions)

THE SOLE PURPOSE OF THIS NOTICE IS TO INFORM THE APPLICANT OF THE STEPS

NECESSARY TO OBTAIN A VALID AND EFFECTIVE COASTAL DEVELOPMENT PERMIT

("CDP"). A Coastal Development Permit for the development described below has been approved but is not yet effective.

Development on the site cannot commence until the CDP is effective.

In order for the CDP to be effective, Commission staff must issue the CDP to the applicant, and the applicant must sign and return the CDP.

Commission staff cannot issue the CDP until the

applicant has fulfilled each of the "**prior to issuance**" Special Conditions. A list of all the Special Conditions for this permit is attached.

2. Construction Permits. PRIOR TO THE INITIATION OF CONSTRUCTION ACTIVITIES,

the Permittee shall provide for Executive Director review, **all necessary building, construction and wetland fill or alteration permits that may be required by federal, state, or local agencies including the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, California Department of Fish and Wildlife, Santa Ana Regional Water Quality Control Board, and Orange County.** Any modifications to the project or its design, configuration, or implementation that occur as a result of these agencies' review and authorization processes shall be provided to the Executive Director for review to determine if an amendment to this coastal development permit is legally required.

Wetland Mitigation Plan.

A. PRIOR TO THE INITIATION OF CONSTRUCTION FOR ANY DEVELOPMENT AUTHORIZED BY THIS COASTAL DEVELOPMENT PERMIT THAT WILL IMPACT

WETLANDS, the Permittee shall submit for review and written approval of the Executive Director a Wetland Mitigation Plan to mitigate for all wetland impacts associated with the proposed construction or installation activities. The Plan shall be developed in consultation with the California Department of Fish & Wildlife, Regional Water Quality Control Board and U.S. Army Corps of Engineers, as applicable, and at a minimum shall include:

22. Protection of Cultural Resources. The Permittee shall implement the requirements of the Protection of Cultural Resources Special Condition provided in Appendix A.

23. Cultural Resources Survey. PRIOR TO THE ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the Applicant shall submit for the review and written approval of the Executive Director an Archeological Research Plan, prepared consistent with Special Condition 22. The tasks required by the plan shall be undertaken prior to any ground disturbance for well or pipeline abandonment outside of the Oil Remainder Areas (ORAs) or for drilling, construction, installation, or demolition within the ORAs and shall incorporate the following measures and procedures:

A. Within the ORAs and proposed work areas for well abandonment and pipeline abandonment/replacement, the applicant shall undertake additional archeological testing to determine the boundary of known prehistoric archeological sites and, where necessary, testing (including the use of cadaver dogs or other test methods recommended by peerreview) to ensure that all other prehistoric archeological sites that may be present on the sites are identified and accurately delineated (to the maximum extent practicable and in accordance with current professional archeological practices). The purpose of any further testing is to locate and delineate the boundaries of all prehistoric cultural deposits present on the site and to avoid disturbance to those deposits by any of the development contemplated by the Applicant in its proposal:

B. If any cultural deposits, including but not limited to skeletal remains and grave-related artifacts, traditional cultural, religious or spiritual sites, midden and lithic material or artifacts, are discovered during the additional archeological testing they shall not be exposed and the testing shall be immediately halted in this location. Additional testing shall be conducted further from the center of the discovery until sterile conditions are

Page 14

December 20, 2016

Permit Application No.: 9-15-1649

encountered. The Archeological Research Plan does not authorize the excavation of any cultural deposits nor data recovery. Nothing in this condition shall prejudice the ability to comply with applicable State and Federal laws if human remains are encountered. However, in compliance with applicable State and Federal laws the project archaeologist shall work with the County Coroner and other authorities to allow Native American human remains to be left in situ, to the maximum extent practical.

C. The Archeological Research Plan shall identify proposed mitigation measures for the preservation in place, recovery and/or relocation/reburial of prehistoric cultural deposits consistent with Native American Tribal guidance that shall be undertaken only if the Executive Director has determined that impacts to cultural deposits are necessary and unavoidable;

D. Archeological and cultural resource monitoring shall be consistent with Special Condition 22;

E. Implementation of the Archeological Research Plan shall not occur until this coastal development permit has been issued.

On Mon, Jul 23, 2018 at 2:14 PM Johntommy Rosas <tattnlaw@gmail.com> wrote:

Please take formal NOTICE that TATTN is lodging its OBJECTIONS AND OPPOSITION the proposed Los Cerritos Oil Consolidation and Wetlands Restoration Project/ Beach Oil Minerals Partners Project in Los Cerritos Wetlands, Long Beach- based on the grounds listed in the previously sent email from us/TATTN

On Mon, Jul 23, 2018 at 1:41 PM Johntommy Rosas <tattnlaw@gmail.com> wrote:

Hi Kate -

1. TATTN/ I are suggesting that you please call and speak with Teresa Henry the CCC district manager in long beach-ASAP-TATTN is/have/has worked with Teresa on numerous projects including the Banning Ranch / Horizontal Development Oil Extraction Abandonment and Consolidation Project-her knowledge and expertise on these types of projects is crucial and should be sought by you /CCC -I know she is bzy but I am sure she can assist you on this project -
2. TATTN/JTR is requesting that the same "banning ranch protocol" be applied on this very similar proposed project -Los Cerritos Oil Consolidation and Wetlands Restoration Project.
3. And the same issues are currently unresolved at los cerritos which are the TRIBAL CULTURAL RESOURCE site locations and perimeters-which have to be known to legally and as required avoid all tribal cultural resources /sites there-There was a skull uncovered there and many sites listed/documentated but remains incomplete and requires more testing by the STP'S process or small excavating equipment-
4. TATTN is hopeful the same CCC protocol is applied at los cerritos including the TCR testing and should happen before and decisions are made or considered - that should also include continued tribal consultation with the new CCC TRIBAL CONSULTATION POLICY -
5. if the CCC fails to implement the same "banning ranch protocol " at los cerritos - the result would be the CCC committing several violations to our rights and to numerous laws-
6. TATTN also advises and requests a continuance on the CCC hearing for this proposed project until the testing is completed and studied including the required tribal consultation with TATTN- including the TCR site delineations - that will clearly show where the projects potential negative adverse impacts would occur-
7. TATTN is also requesting that the CITY OF LONG BEACH request the continuance as well- that way TATTN and CLB can work out the required details for testing in cooperation and concurrence with CCC - TATTN has consulted on numerous projects with CLB's Craig Chalfant who is cc'd on this reply-

TATTN looks forward to your responses in a timely manner-
/s/ JOHNTOMMY ROSAS

LCW CASE EXHIBIT 34

19-000231	CA-LAN-231	Dixon 1961	Shell Midden
19-000232	CA-LAN-232	Dixon 1961	Shell Midden
19-000233	CA-LAN-233	Dixon 1961	Shell Midden with Lithic Artifacts
19-000271	CA-LAN-271	Dixon 1959	Shell Midden (destroyed by oil well development)
19-000272	CA-LAN-272	Dixon 1961; Brooks, Conrey & Dixon 1965	Human Skull

On Mon, Jul 16, 2018 at 2:01 PM Johntommy Rosas <tattnlaw@gmail.com> wrote:

Sounds good, thank you.

On Mon, Jul 16, 2018 at 1:47 PM Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov> wrote:

Thanks for getting back to me so quickly. I would definitely like to hear your concerns and will look out for your letter.

Kate

From: Johntommy Rosas <tattnlaw@gmail.com>

Sent: Monday, July 16, 2018 11:57:24 AM

To: Huckelbridge, Kate@Coastal

Subject: Re: Outreach regarding the Beach Oil Minerals Partners Project in Los Cerritos Wetlands, Long Beach

Thanks Kate -

I have been observing the CLB process and they are way off on it-

but now I want to start weigh in on it -

their consultation is flawed -

I will send you my letter to them on our concerns and objections -

it should be done this week-

thanks jt

On Mon, Jul 16, 2018 at 11:11 AM Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov> wrote:

Hello! I am writing to you regarding the Los Cerritos Oil Consolidation and Wetlands Restoration Project. As you are likely aware, the City of Long Beach approved a Final EIR and permits for this project which is proposed by Beach Oil Minerals Partners (BOMP) and involves an expanded and consolidate oil production operation on two new sites in Long Beach and the restoration of the existing Synergy oil field to tidal wetlands over a 40 year period. I believe the City reached out to you as part of a tribal consultation process.

This project also requires approval by the Coastal Commission. This is a two-phase process. The first phase is a hearing on an amendment to the City of Long Beach's Local Coastal Program (LCP) which is currently scheduled for the Commission's August hearing (August 8-10).

The second phase will be a hearing on a Coastal Development Project for the BOMP project which is likely to be scheduled for later this year.

I am reaching out to you in advance of our scheduled hearing to see if you have any additional thoughts or concerns you would like to share with the Coastal Commission regarding this project and the proposed land use changes within the City of Long Beach. Please feel free to email or call me (at the number below) if you wish to discuss this project and the Commission's upcoming hearing or if you have any questions.

Thank you for your time and attention!

Kate Huckelbridge

Kate Huckelbridge, PhD
California Coastal Commission
Energy, Ocean Resources & Federal Consistency Division
45 Fremont St. Ste. 2000
San Francisco, CA 94105
415-396-9708



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JOHN TOMMY ROSAS

TRIBAL ADMINISTRATOR

TRIBAL LITIGATOR - TATTN JUDICIAL # 0001

TONGVA ANCESTRAL TERRITORIAL TRIBAL NATION

A TRIBAL SOVEREIGN NATION UNDER THE UNDRIP AND AS A TREATY [s] SIGNATORIES RECOGNIZED TRIBE, WITH HISTORICAL & DNA AUTHENTICATION ON CHANNEL ISLANDS AND COASTAL VILLAGES - AND AS A CALIFORNIA NATIVE AMERICAN TRIBE / SB18-AB 52-AJR 42-ACHP/NHPA - CALIFORNIA INDIANS JURISDICTIONAL ACT U S CONGRESS APPROVED MAY 18, 1928 45 STAT. L 602

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From: [Posner, Chuck@Coastal](mailto:Posner.Chuck@Coastal)
To: [Huckelbridge, Kate@Coastal](mailto:Huckelbridge.Kate@Coastal)
Subject: FW: Los Cerritos Wetlands
Date: Monday, July 23, 2018 9:06:44 AM

From: RACHAEL LEHMBERG [mailto:gpaboat@msn.com]
Sent: Sunday, July 22, 2018 3:54 PM
To: Chck.Posner@coastal.ca.gov
Subject: Los Cerritos Wetlands

Dear Mr. Posner,

The so-called "Wetlands Restoration" Project has been fundamentally dishonest from the start. The oil company dangled the promise of restoration in front of the city authorities, but it is a meaningless promise. In the first place this restoration is to take place over a period of 40 years. Second, the promise of restoration is a trick. The plans include crisscrossing the area with paths and creating a park on top of contaminated soil. We don't need this. We don't want this. Please help us keep our homes safe and our wetlands protected. Please say "no" to this dishonest proposal!

Thank you,

Rachael Lehmborg
1603 Merion Way #42K
Seal Beach CA, 90740
(Leisure World)



Los Cerritos Wetlands Land Trust
for Long Beach and Seal Beach

PO Box 30165
Long Beach, CA 90853

www.lcwlandtrust.org

**Requesting Approval of City of
Long Beach LCP Amendment
No. 1-18 (LCP-5-LOB-18-0026-1)
(SEADIP)**

July 20, 2018

Kate Huckelbridge, PhD
California Coastal Commission
Energy, Ocean Resources & Federal Consistency Division
45 Fremont St. Ste. 2000
San Francisco, CA 94105

Via Email Kate.Huckelbridge@coastal.ca.gov
loscerritoswetlands@coastal.ca.gov

Re: Beach Oil Minerals/ Los Cerritos Wetlands Oil Consolidation and Restoration Project

Dear Dr. Huckelbridge and Honorable Commissioners:

The Los Cerritos Wetlands Land Trust offers this letter of support for the Los Cerritos Wetlands Oil Consolidation and Restoration Project proposed by Beach Oil Minerals (BOM). The Land Trust is committed to facilitating the purchase of acreage for sale in the Los Cerritos Wetlands, reconnecting and restoring the estuary remnants, providing a setting for generations of families to discover the wonders of this one-of-a-kind environment, and permanently protecting this precious resource before it is gone forever. We fulfill our mission by being active watchdogs of our wetlands, by participating in local planning processes, and by reviewing projects as proposed. We monitor the lands in and around Los Cerritos Wetlands to help protect them and engage in active dialogue with the community. We also have a robust wetlands education program, and lead monthly educational tours through the wetlands.

We have carefully reviewed the proposed Project as we knew it would have immense impact on our local wetlands. We support this Project because it includes comprehensive wetlands and habitat restoration, provides unique public access opportunities, consolidates oil operations offsite, and will transfer ownership of a substantial portion of Los Cerritos

Wetlands into the public domain. These are all things for which the Land Trust has long advocated.

Our review process – of both the proposed oil consolidation and restoration aspects of the Project– has been diligent and thoughtful. We formed a dedicated committee of Board members who did a great deal of their own research and reviewed all relevant information regarding the proposed project. We had numerous meetings with the BOM principals and their experts and consultants in order to ensure our many questions were answered and addressed. We have always understood that the potential for wetlands restoration is the cornerstone of the Project. However, the project area is known to be contaminated. We were concerned that site contamination could spread once outside water was introduced to the area, which could harm sensitive habitats and the species which depend on them. We were concerned that the restoration would not live up to its potential. To alleviate this concern, with BOM's agreement, we brought our own soil and water experts into the process in order to ensure we had a clear understanding of the details regarding contamination on the site and how best to remediate it. BOM has been a transparent and integral partner in our review process, responding promptly to our many detailed questions and providing our committee with the answers they needed to understand the Project. In addition, as this Project is implemented, BOM has committed to involving the Land Trust in order to ensure we are fully updated and involved as the Project moves through the regulatory review process.

The benefits of this Project are meaningful and enduring.

The Project offers tangible conservation benefits. The Project will reduce the footprint of oil operations to approximately 10 acres from approximately 187 acres, accelerating and funding a transformation of this highly degraded landscape to a restored functioning wetlands and uplands.

The Project maintains environmental integrity. As a result of our conversations with the BOM team and advice from our soil and water consultant, BOM has committed to a thorough and transparent process regarding the assessment and removal of onsite hazards and contamination. This will ensure there will be no site contamination of Los Cerritos Wetlands as the land transitions from oil operations to conservation.

The Project could offer conservation benefits sooner. Through conversations with BOM, we know they are committed to accelerating the transition to conservation if at all feasible.

Our watchdog role is integral. This process is ongoing and BOM has agreed to full communication with us, including information regarding production numbers so we will know if BOM adheres to its well abandonment phase-out obligations which will allow for the transition from oil operations to restored wetlands. The Land Trust's experts will play a significant oversight role, including helping to scope an ecological

risk assessment prior to restoration work, receiving and reviewing any and all reports about site conditions, testing, and clean-up protocols. We will be on-site when excavation or other key activities occur.

BOM has been a model for dialogue and outreach between an oil company and an environmental advocacy organization. We appreciate the time and effort BOM put in to reaching out to us, the many meetings they had with us, and their fast response to our concerns. We consider BOM a partner and look forward to an enduring relationship with them. We hope this will serve as a model for other projects that will impact Los Cerritos Wetlands.

For all of these reasons, our Board has voted unanimously to support the BOM's wetlands consolidation and restoration Project and we look forward to a continuing partnership with them, the Los Cerritos Wetlands Authority, and other conservation groups in order to see through this joint commitment to transition from oil to conservation.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth J. Lambe".

Elizabeth Lambe
Executive Director
Los Cerritos Wetlands Land Trust

cc: Michael DiSano, Project Manager, Beach Oil Minerals

From: [Bobbie Montes](#)
To: [Coastal Los Cerritos Wetlands](#); [Energy@Coastal](#); [info@loscerritoswetlandsrestorationplan.com](#)
Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)
Date: Monday, July 23, 2018 6:15:42 PM

Dear Ms. Huckelbridge,

I support the Los Cerritos Wetlands Oil Consolidation and Restoration Project and urge the California Coastal Commission to approve the Local Coastal Program Amendment (LCPA) to enable the project to move forward to a hopeful approval of the CDP permit.

Let's restore the wetlands!

Thank you for your time and consideration.

Sincerely,

Bobbie Montes

From: [Stevin Cohen](#)
To: Huckelbridge.Kate@Coastal
Subject: Los Coyotes Wetlands Project
Date: Sunday, July 22, 2018 10:17:40 PM

Dear Kate,

I'm writing to enlist your support to RESIST this project that will only benefit Big oil, while jeopardizing the air we breathe, the water we drink, our real estate property values, and the environment we enjoy, and live in.

See you in Redondo Beach on August 8th. Please do the right thing, and APPOSE this environmentally detrimental project.

Sincerely yours,
Stevin Cohen
Seal Beach, California

Sent from my iPad

From: anngadfly@aol.com
To: Huckelbridge_Kate@Coastal
Cc: Hoorae1@aol.com; jweins123@hotmail.com; mbcotton@hotmail.com; renee_matt@live.com; corlisslee@aol.com; mpshogri@msn.com; tami_bennett@hotmail.com; achris259@yahoo.com
Subject: Comments on the Oil Consolidation
Date: Sunday, July 22, 2018 3:53:50 PM
Attachments: [CCC comments 718.pdf](#)
[CCC comments 718.pages](#)

Dear Kate,

I am a director for a Long Beach non-profit, Citizens About Responsible Planning (CARP). I am also a board member of Protect the Los Cerritos Wetlands. I opposed the Los Cerritos Wetlands Oil Consolidation and Restoration project at the Planning Commission and appealed their approval at the Long Beach City Council on Jan. 16, 2018.

I have been informed by Anna Christensen that you are in the process of writing the staff report for the Aug. 8 hearing on the LCP for this oil project. Your comment letter on the DEIR asked so many pertinent questions, which I hope you agree were not been adequately answered.

I urge the staff to recommend a denial of this LCP.

I am attaching my comments on issues which I hope pertain to the August hearing. If you would like to discuss any of these, please feel free to call me at 562/596-7288

Gratefully,
Ann Cantrell

Dear Kate,

I believe the City erred in basing the EIR on the current SEADIP, which does not conform with the City's LCP. The EIR was approved by the City Council on January 16, 2018. Since that time, the Council has now approved a new zoning plan, SEASP. Instead of asking for a Local Coast Plan change for SEASP, they are amending the now out-dated SEADIP to conform with their EIR. This request should be denied and the proposed project brought back conforming with the new plan known as SEASP.

The two zoning plans are very different in how they protect the wetlands. SEASP does not allow any development on the wetlands; SEADIP allows residential and industrial development on the wetlands. In fact, there is a suggested Alternative 2: No Project/ Development Consistent with Existing Zoning Alternative, which would allow development currently permitted by SEADIP. There is no Alternative which would conform with the replacement zoning, SEASP, in other words No Project/Development Consistent with Proposed Zoning Alternative.

There is also an Alternative allowing a non-wetland restoration use on the LCWA site: Alternative 4: SCE Substation Alternative.

However, there is no alternative allowing for the court ordered use. Don May of Earth Corps, the former owner of the 5 acres at Studebaker and 2nd, states that when SC Edison conveyed this property to Earth Corps as settlement for the damage done to marine life at San Onofre, **the court ordered that the property was to be used to further the restoration of the estuary of the San Gabriel River.**

On August 31, 2017, when asked if this was still the case, Don wrote: "Yes, it is still valid and binding, in as much as I am still signatory and have never been contacted as to any change".

Don added: The tentative plan at the time was to use the 5 acres to construct a library to house Dr Rim Fay's extensive Pacific Bio Marine library with extensive instructions on how to propagate every single plant and critter found on the entire So. Cal. Bight, along with a community meeting room".

A marine library/visitor center was never considered, rejected or studied as an

Alternative use for the LCWA site. Instead of an SCE Substation, a solar energy site could be another Alternative.

For the above reasons I consider the Alternatives studied inadequate, the EIR based on a soon to be changed zoning plan and that the LCP should be denied.

PROJECT OBJECTIVES

One of the Project Objectives is to: “Reduce the footprint of oil production operations on both privately owned and City-owned portions of the Los Cerritos Wetlands to less than 10 acres of property with minimal habitat impacts.”

Draft EIR Chapter 2, Project Description, contains information on the number of active, idle and abandoned wells on the Synergy Oil Field, City Property, Pumpkin Patch, and LCWA sites. As identified in Draft EIR Table 2-1, Oil Wells by Site, there are 22 active wells, 17 idle wells, and 13 plugged and abandoned wells on the Synergy Oil Field site; 13 wells on the City Property; 1 active well on the Pumpkin Patch site.

Thus, there appear to be currently **36 active wells with limited lifetimes—all to be removed within 44 years.**

The current production from all active wells is approximately 300 barrels per day. The anticipated production from the proposed project is estimated to be approximately 24,000 barrels per day.

I would argue that continuing to extract oil from the current privately owned and City-owned portion of the Los Cerritos Wetlands, while adding 120 new oil and water wells to the 10 acres is not reducing, but expanding the oil production footprint, especially when considering the increased amount of oil expected.

In addition, although labeled a Restoration Project, the only restoration that will occur is that for the Synergy Mitigation Bank. The City Property will

have the oil wells removed, but no restoration is being planned by the developer for this site. Steamshovel Slough is already a functioning wetland, but is going to be restored by breaching the berm that currently protects these wetlands from oil operations. This will destroy the habitat of the endangered Beldings Savannah Sparrow and other wetland inhabitants.

30233 of the CA Coastal Act states: (a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following: (5) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.

I would argue that this section prohibits new oil extraction, especially on the Pumpkin Patch and that there are less environmentally damaging alternatives, especially for the pipeline.

PUMPKIN PATCH HAS WETLANDS OBLIGATES

The Lyon's property has layers of land fill and has been used as a Pumpkin Patch, Christmas tree lot, storage for Grand Prix tires, oil extraction and was once a CA Least Tern nesting site. Jonna Engel, the Coastal Commission biologist, reports that some of this property has the hydrology to qualify as wetlands. These photos of the endangered Southern Tar Plant are from her July, 2017 report.

However, she concluded there were not enough plants to qualify as ESHA (Environmentally Sensitive Habitat Area). This is not surprising, as the property owners have been killing off all wetlands plants for years.

J. Engel memo re: Synergy Oil



Figure 4. Photos of the south-east corner of the Pumpkin Patch looking north of the depressed area. Bottom photo – sand spurry, and southern tarplant.

In July, 2004, Don May, as President of Earth Corps and the Los Cerritos Wetlands Lands Trust, reported at the NOP for a purposed strip mall on the Pumpkin Patch, that there were 3 acres, dense cover of Southern Tarplant--about one third of the site--and a thick mat of heliotrope and pickleweed over much of the rest.





On August 6, 2004, I visited the site with Don. We found about half the plants had been scraped off, as seen above. Don wrote to US Fish and Wildlife on August 12, 2004, and reported that the rest of the plants were sprayed with herbicides on 8/8/04.

On January 12, 2018, I was alerted that there was heavy equipment working on the Pumpkin Patch. When I arrived, there were no bull dozers, but I did find the area scraped clean of all vegetation.



There were patches of very green, healthy plants growing inside the fence, but otherwise, even the back of the property, not used for Christmas trees, was completely bare.



After the December/January rains, it would be reasonable to find some sign of plants growing in locations other than just along the fence. I can find no explanation for this perfectly level moonscape, other than scraping by a bulldozer.

The EIR states: **“Grading of the Pumpkin Patch site would result in direct impacts to approximately 155 individuals of southern tarplant. The loss of 155 individuals of southern tarplant would be significant considering this species is ranked CRPR 1B and is, therefore, considered rare, threatened, or endangered in California and elsewhere;”**

I believe the Pumpkin Patch property has many wetlands obligate plants, soil and seasonal ponds. Before this LCP is granted, another survey needs to be done, (after the next rainfall), to determine the existence of wetlands plants, especially the endangered Southern Tar Plant.

Earthquake, Tsunami, Sea-level Rise Concerns

It is obvious that this proposed oil expansion does not conform with the CA Coastal Act.

COASTAL ACT

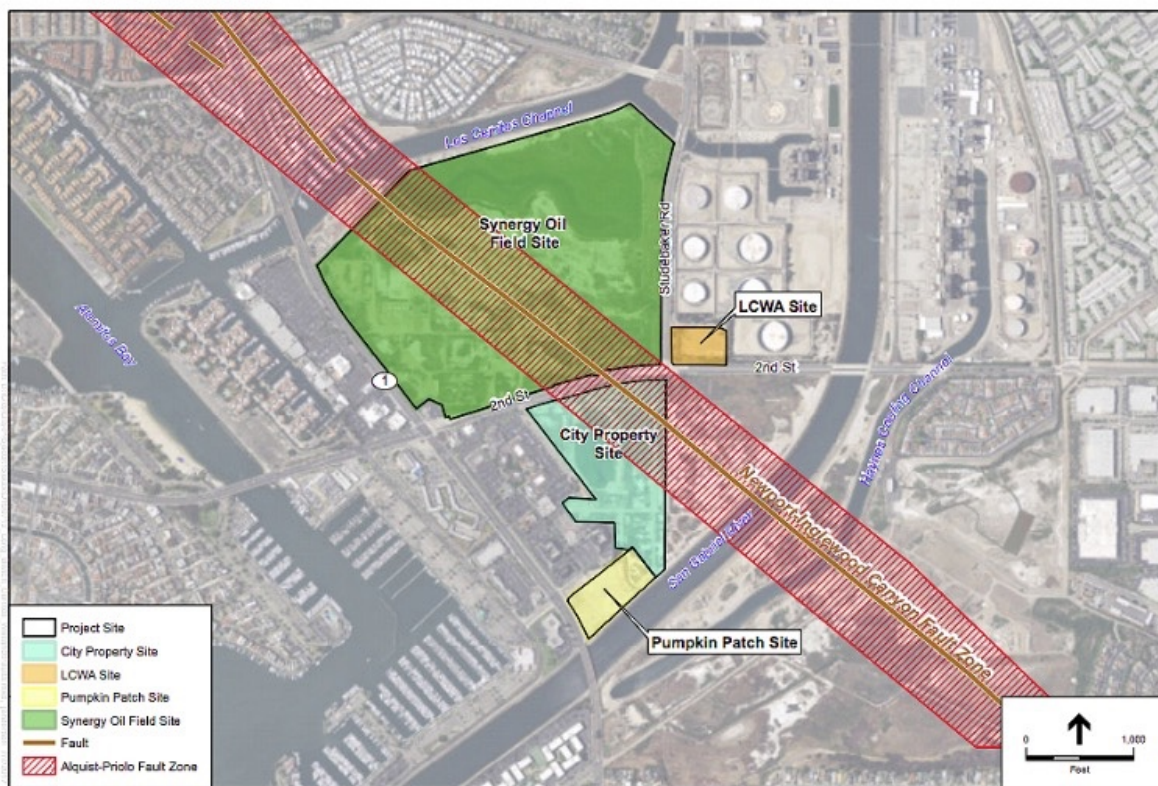
30253. New development shall do all of the following:

(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.

30262. (a) **Oil and gas development shall be permitted in accordance with Section 30260, if the following conditions are met:**

(1) The development is performed safely and consistent with the geologic conditions of the well site. (2) New or expanded facilities related to that development are consolidated, to the maximum extent feasible and legally permissible, unless consolidation will have adverse environmental consequences and will not significantly reduce the number of producing wells, support facilities, or sites required to produce the reservoir economically and with minimal environmental impacts.

30263. **30263** (a) New or expanded refineries or petrochemical facilities not otherwise consistent with the provisions of this division shall be permitted if (1) alternative locations are not feasible or are more environmentally damaging; (2) adverse environmental effects are mitigated to the maximum extent feasible; (3) it is found that not permitting such development would adversely affect the public welfare; (4) the facility is not located in a highly scenic or seismically hazardous area, on any of the Channel Islands, or within or contiguous to environmentally sensitive areas; and (5) the facility is sited so as to provide a sufficient buffer area to minimize adverse impacts on surrounding property.



SOURCE: ESRI; City of Long Beach 2015; California Department of Conservation 2001

Long Beach Cerritos Wetland - 150712
Figure 3.5-2
 Newport-Inglewood Fault Zone

The EIR states: “The proposed pipeline corridor width required for the buried pipelines and utility corridor would be approximately 5.5 feet. The underground utility corridor would be constructed to a depth of approximately 5 feet below ground surface. In the unlikely chance that an adverse event occurs, such as an earthquake, pressure transmitters would be able to detect a pressure imbalance, and shut-off valves located on the Pumpkin Patch and LCWA sites would shut down the flow.”

Experts are predicting that the Newport/Inglewood fault could be the site of another earthquake at any time. How large an earthquake can these shut-off valves withstand? There are numerous pipeline breaks/leaks in new pipelines nationwide—even those which are not on an earthquake fault.

The EIR also states: “In order to avoid impacts due to the presence of the Newport-Inglewood Fault that traverses the City Property site, the project could not place the pipeline underground. Therefore, an aboveground alignment for the pipeline was proposed.”

While acknowledging the danger of putting the pipeline underground because of the earthquake fault, the plan is still to run the pipeline under

the Second Street/Studebaker intersection! A pipeline break at this location during an earthquake would block one of the few escape routes for area residents.

From the EIR: Impact HY-5: The project would not place buildings, oil production infrastructure, workers, or the public within areas anticipated to be inundated due to sea level rise. (Less than Significant)

Mitigation Measures: None required.

Significance Determination: Less than Significant.

According to recent studies, sea level rise is occurring much faster than anticipated when the EIR was written. (News July 20,2018: Antarctica is melting three times faster than it was just 10 years ago.) I question whether the predictions in the DEIR are correct and believe new studies on sea level rise are needed.

From the EIR: Impact HY-7: The project would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow. (Less than Significant)

Operation

The entire project site is located in a tsunami inundation zone. Over a 40-year period, the oil production operations on the Synergy Oil Field and City Property sites would be removed and replaced with oil production operations on the Pumpkin Patch and LCWA sites, with about the same number of workers. Therefore, the project would not increase the number of workers being exposed to risk of a tsunami.

Mitigation Measures: None required.

Significance Determination: Less than Significant.

Notice the EIR does not say workers will be safe, only that ‘about the same number of workers’ will be in danger as now.

With earthquake, tsunami and sea-level rise hazards, this location is obviously the wrong place to do additional oil drilling.

HYDROLOGY AND WATER QUALITY

The proposed water injection is said to be for combating subsidence, but is also a method used for fracking or 'well enhancement'. This requires the use of potable water, a scarce commodity during a drought. Since LB obtains 50% of its water from water wells, I am also concerned about contamination of our drinking water.

The Draft EIR states: Impact HY-2: The project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the groundwater table. (Less than Significant)

Construction

Construction of the proposed project facilities would involve activities that would require the use of water, including the drilling of new oil production and produced-water injection wells (i.e., water for mixing with the drilling mud and concrete for the surface completions) and plugging of existing oil and injection wells (i.e., water for mixing with the drilling mud and cement grout) as wells are plugged and abandoned on the Synergy Oil Field and City Property sites and relocated to the Pumpkin Patch and LCWA sites. In addition, other construction activities such as concrete mixing and dust control for buildings, well cellars, and associated infrastructure would require water. The local water supply is served by the Long Beach Water District (LBWD), which receives a mix of groundwater, imported water and recycled water (see Section 3.17, Utilities and Service Systems, for more details on project area water supply and project demand). Therefore, construction water demand could contribute to a reduction groundwater supplies.

This sounds like a depletion to me.

Oil Wells

"Water supplies would be required for (1) the drilling of the oil wells for oil production and injection wells for produced water for the drilling mud and cleaning of equipment; (2) the plugging and abandonment of non-productive

wells for the drilling mud, cement grout, and cleaning of equipment; and (3) the hydrostatic pressure testing of pipelines and storage tanks. The required water would be supplied by tapping into existing LBWD water lines..

The analysis of water supply from all sources, which includes groundwater, imported water, and recycled water, is provided in Section 3.17, Utilities and Service Systems, Impact UT-2 and includes Table 3.17-4, Summary of Projected Annual Water Usage, which summarizes the projected water use for construction and operation activities over the next 60 years. Both construction and operations water use are listed because the activities overlap over time. The listed years are the anticipated years; the actual years when well installations and abandonment would occur would vary depending on the actual rate of drilling new wells and the timing at which older existing wells become unproductive. In any case, the maximum combined construction and operations water use would be about 124 acre-feet from the third year through eleventh year when oil wells would be constructed at the Pumpkin Patch and LCWA sites. Water use would be less in all other years. As discussed in the Utilities section, the LBWD expects to have at least 76,983 acre-feet/year (AFY) of available surplus water, which far exceeds the needs of the proposed project for any year. Therefore, the impacts to groundwater supplies during construction would be less than significant. “

All Other Non-Oil Wells Structures

Water required for construction activities such as concrete mixing and dust control would be supplied by tapping into existing LBWD water lines. Since the LBWD receives a mix of groundwater, imported water and recycled water, construction water demand could contribute to a reduction groundwater supplies. As discussed above, the LBWD expects to have at least 76,983 AFY of available surplus water, which far exceeds the needs of the proposed project for any year. Therefore, the impacts to groundwater supplies would be less than significant.

The processes of separating the oil from the produced water, as well as other operational activities, would require water supply, as discussed in Section 3.17, Utilities and Service Systems, and groundwater is the primary source of water for the LBWD; however, as previously discussed, the LBWD expects to have at least 76,983 AFY of available surplus water, which far exceeds the needs of the proposed project for any of the next 60 years. “

The DEIR states over and over that Long Beach expects to have plenty of available drinking water for the next 60 years. I find this hard to believe. If LBWD has so much available water, why are residents allowed to only water lawns 2 or 3 times a week? Why are the trees and grass in our public parks dying from lack of water? California is in continual drought and all predictions are for increased warming. Water use is a very good reason to deny this project.

5.4.5 Alternative 5: Relocated Pipeline Alternative

The Relocated Pipeline Alternative would relocate the aboveground pipeline and utility corridor to the wider oil service road located on the eastern portion of the City Property site.

Kate Hucklebridge wrote in her comment letter on the EIR:

“We recommend that an alternative pipeline route between the Pumpkin Patch and LCWA should be evaluated. The City site is almost 100% wetlands and has a significant restoration potential. The existing SEADIP and other City planning efforts designate this area for restored wetlands. Placing a pipeline through the middle of the site diminishes the value of the surrounding wetlands and fragments the habitat on the site.”

In spite of the suggestion by CCC staff to place the pipeline along Second Street and Shopkeeper Road, the City Council approved Alternate 5. I would urge the CCC to require another route for the pipeline which will preserve as much of the wetlands as possible. Or better yet, deny the oil drilling and pipeline project completely.

Thank you for the opportunity to comment.

Ann Cantrell, Director, Citizens About Responsible Planning (CARP)

Board member, Protect the Los Cerritos Wetlands

3106 Claremore Ave. Long Beach, CA 90808

562/5967288

From: [Ed Zwieback](#)
To: [Coastal Los Cerritos Wetlands](#); Energy@Coastal; info@loscerritoswetlandsrestorationplan.com
Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)
Date: Saturday, July 21, 2018 1:06:44 PM

I support the Los Cerritos Wetlands Oil Consolidation and Restoration Project and urge the California Coastal Commission to approve the Local Coastal Program Amendment (LCPA) to enable the project to move forward to a hopeful approval of the CDP permit.

Let's restore the wetlands!

Sincerely,
Ed Zwieback
Long Beach

From: [David Barrad](#)
To: [Coastal Los Cerritos Wetlands](#); +EORFC@coastal.ca.gov; +info@loscerritoswetlandsrestorationplan.com
Subject: Los Cerritos Wetlands
Date: Saturday, July 21, 2018 10:46:42 AM

Hi Kate:

I am a Long Beach homeowner writing to let you know that I support the Los Cerritos wetlands restoration project. I grew up near the property and now own that childhood home and I would love to see this rare ecosystem expanded and made available to public view.

Many thanks,
David Barrad

From: [Mona](#)
To: [Coastal Los Cerritos Wetlands](#); [Energy@Coastal](#); [info@loscerritoswetlandsrestorationplan.com](#)
Subject: Fwd: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)
Date: Saturday, July 21, 2018 4:39:23 PM

----- Forwarded Message -----

Subject: Public Comment on August 2018 Agenda Item Wednesday 15a - City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)
Date: Sat, 21 Jul 2018 13:06:40 -0700
From: Ed Zwieback <ed.zwieback@gmail.com>
To: loscerritoswetlands@coastal.ca.gov, EORFC@coastal.ca.gov, info@loscerritoswetlandsrestorationplan.com

I support the Los Cerritos Wetlands Oil Consolidation and Restoration Project and urge the California Coastal Commission to approve the Local Coastal Program Amendment (LCPA) to enable the project to move forward to a hopeful approval of the CDP permit.

Let's restore the wetlands!

Sincerely,
Mona Panitz
Long Beach

From: [Elizabeth Lambe](#)
To: [Huckelbridge. Kate@Coastal](mailto:Huckelbridge.Kate@Coastal); [Coastal Los Cerritos Wetlands](#)
Cc: [Michael Di Sano](#)
Subject: Requesting Approval of City of Long Beach LCP Amendment No. 1-18 (LCP-5-LOB-18-0026-1) (SEADIP)
Date: Friday, July 20, 2018 2:47:56 PM
Attachments: [BOM CCC Letter of Support.pdf](#)

Re: Beach Oil Minerals/ Los Cerritos Wetlands Oil Consolidation and Restoration Project

Dear Dr. Huckelbridge and Honorable Commissioners:

The Los Cerritos Wetlands Land Trust offers this letter of support for the Los Cerritos Wetlands Oil Consolidation and Restoration Project proposed by Beach Oil Minerals (BOM).

Thank you for your consideration.

My best to you,

Elizabeth Lambe
Executive Director
Los Cerritos Wetlands Land Trust
<http://lcwlandtrust.org/>



Los Cerritos Wetlands Land Trust
for Long Beach and Seal Beach

PO Box 30165
Long Beach, CA 90853

www.lcwlandtrust.org

**Requesting Approval of City of
Long Beach LCP Amendment
No. 1-18 (LCP-5-LOB-18-0026-1)
(SEADIP)**

July 20, 2018

Kate Huckelbridge, PhD
California Coastal Commission
Energy, Ocean Resources & Federal Consistency Division
45 Fremont St. Ste. 2000
San Francisco, CA 94105

Via Email Kate.Huckelbridge@coastal.ca.gov
loscerritoswetlands@coastal.ca.gov

Re: Beach Oil Minerals/ Los Cerritos Wetlands Oil Consolidation and Restoration Project

Dear Dr. Huckelbridge and Honorable Commissioners:

The Los Cerritos Wetlands Land Trust offers this letter of support for the Los Cerritos Wetlands Oil Consolidation and Restoration Project proposed by Beach Oil Minerals (BOM). The Land Trust is committed to facilitating the purchase of acreage for sale in the Los Cerritos Wetlands, reconnecting and restoring the estuary remnants, providing a setting for generations of families to discover the wonders of this one-of-a-kind environment, and permanently protecting this precious resource before it is gone forever. We fulfill our mission by being active watchdogs of our wetlands, by participating in local planning processes, and by reviewing projects as proposed. We monitor the lands in and around Los Cerritos Wetlands to help protect them and engage in active dialogue with the community. We also have a robust wetlands education program, and lead monthly educational tours through the wetlands.

We have carefully reviewed the proposed Project as we knew it would have immense impact on our local wetlands. We support this Project because it includes comprehensive wetlands and habitat restoration, provides unique public access opportunities, consolidates oil operations offsite, and will transfer ownership of a substantial portion of Los Cerritos

Wetlands into the public domain. These are all things for which the Land Trust has long advocated.

Our review process – of both the proposed oil consolidation and restoration aspects of the Project– has been diligent and thoughtful. We formed a dedicated committee of Board members who did a great deal of their own research and reviewed all relevant information regarding the proposed project. We had numerous meetings with the BOM principals and their experts and consultants in order to ensure our many questions were answered and addressed. We have always understood that the potential for wetlands restoration is the cornerstone of the Project. However, the project area is known to be contaminated. We were concerned that site contamination could spread once outside water was introduced to the area, which could harm sensitive habitats and the species which depend on them. We were concerned that the restoration would not live up to its potential. To alleviate this concern, with BOM's agreement, we brought our own soil and water experts into the process in order to ensure we had a clear understanding of the details regarding contamination on the site and how best to remediate it. BOM has been a transparent and integral partner in our review process, responding promptly to our many detailed questions and providing our committee with the answers they needed to understand the Project. In addition, as this Project is implemented, BOM has committed to involving the Land Trust in order to ensure we are fully updated and involved as the Project moves through the regulatory review process.

The benefits of this Project are meaningful and enduring.

The Project offers tangible conservation benefits. The Project will reduce the footprint of oil operations to approximately 10 acres from approximately 187 acres, accelerating and funding a transformation of this highly degraded landscape to a restored functioning wetlands and uplands.

The Project maintains environmental integrity. As a result of our conversations with the BOM team and advice from our soil and water consultant, BOM has committed to a thorough and transparent process regarding the assessment and removal of onsite hazards and contamination. This will ensure there will be no site contamination of Los Cerritos Wetlands as the land transitions from oil operations to conservation.

The Project could offer conservation benefits sooner. Through conversations with BOM, we know they are committed to accelerating the transition to conservation if at all feasible.

Our watchdog role is integral. This process is ongoing and BOM has agreed to full communication with us, including information regarding production numbers so we will know if BOM adheres to its well abandonment phase-out obligations which will allow for the transition from oil operations to restored wetlands. The Land Trust's experts will play a significant oversight role, including helping to scope an ecological

risk assessment prior to restoration work, receiving and reviewing any and all reports about site conditions, testing, and clean-up protocols. We will be on-site when excavation or other key activities occur.

BOM has been a model for dialogue and outreach between an oil company and an environmental advocacy organization. We appreciate the time and effort BOM put in to reaching out to us, the many meetings they had with us, and their fast response to our concerns. We consider BOM a partner and look forward to an enduring relationship with them. We hope this will serve as a model for other projects that will impact Los Cerritos Wetlands.

For all of these reasons, our Board has voted unanimously to support the BOM's wetlands consolidation and restoration Project and we look forward to a continuing partnership with them, the Los Cerritos Wetlands Authority, and other conservation groups in order to see through this joint commitment to transition from oil to conservation.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth J. Lambe".

Elizabeth Lambe
Executive Director
Los Cerritos Wetlands Land Trust

cc: Michael DiSano, Project Manager, Beach Oil Minerals

From: [S Brothers](#)
To: Huckelbridge_Kate@Coastal
Subject: The Los Cerritos Wetlands project in Long Beach
Date: Monday, July 16, 2018 8:57:31 AM
Attachments: [Los_Cerritos_Wetlands_Coastal_Commission_letter_Kate_Huckelbridge_july_2018.pdf](#)

Dear Ms. Huckelbridge,

I am writing to you today in order to share some concerns that I have with the proposed oil drilling initiatives in the Long Beach Los Cerritos wetlands.

I am attaching a PDF letter with my concerns. It contains maps and sea rise models that are difficult to incorporate in a normal email in terms of formatting.

Thank you for your time and consideration. I greatly appreciate the Coastal Commission mission and appreciate your, and your colleagues', vigilance.

Sincerely,
Steve Brothers
Long Beach, CA

Dear Ms. Huckelbridge,

I wanted to share some of the concerns that I along with many other Long Beach residents have regarding the so called, Los Cerritos Wetlands Restoration and Oil Consolidation project. I believe the proposed project violates provisions in the Coastal Act and apart from that, exacerbates the climate crisis that the entire planet is facing in general, as well as the sea rise issues that Long Beach faces specifically.

Many of what I consider the most concerning details of this oil drilling initiative in the wetlands are only known to me because of the insistence of Coastal Commission staff in their response to the project's EIR. These details are not publicly presented anywhere else that I am aware of, so we are grateful to CC staff for raising these issues and impelling the project proponents to provide details to which we would not otherwise be privy.

As you are no doubt aware, there are 4 properties at the heart of this oil company scheme. Two of these properties are the focus of new drilling aspirations by the oil company. A brief overview of the planned initiatives on two of the properties:

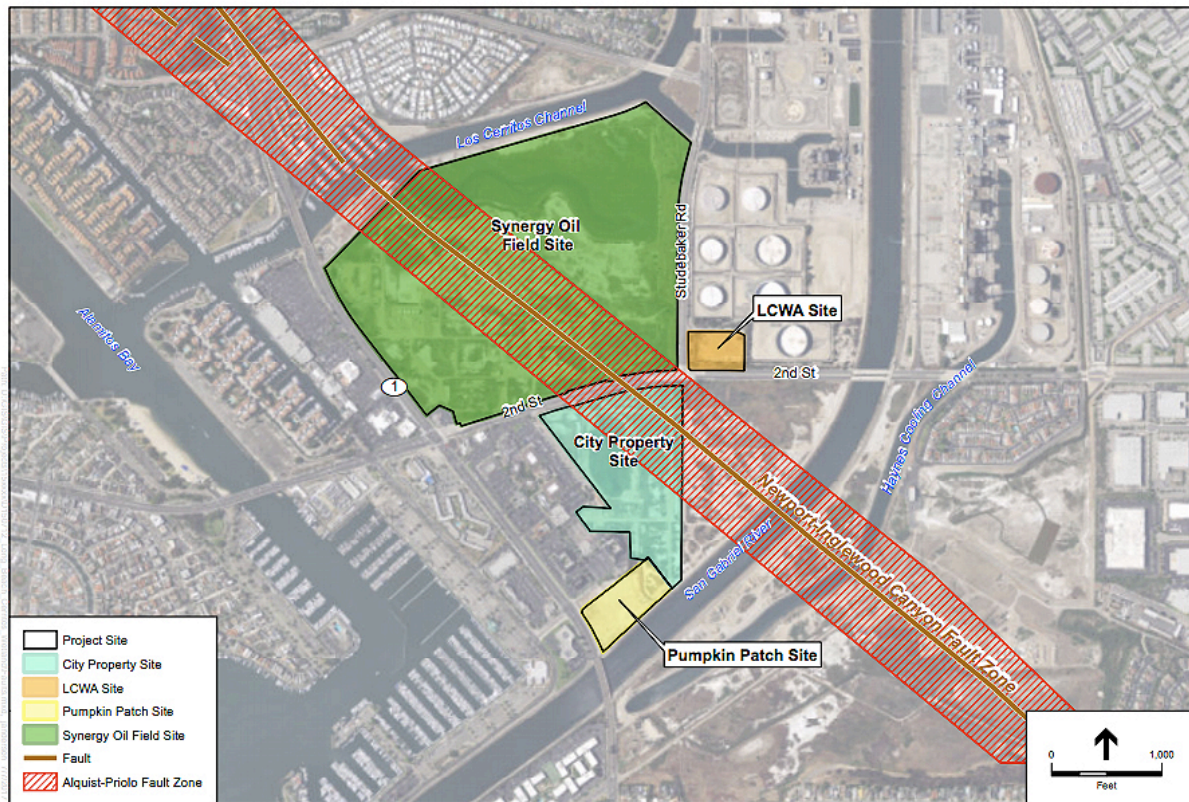
Pumpkin Patch:

Drill **50 new wells** (a combination of oil production, water injection, and water source wells), to be contained in 3 well cellars, which will be approximately 8 feet below grade. Construct and operate oil production facilities, including 2 storage tanks, as well as related systems and equipment. Use drill rigs to establish new wells and to maintain existing wells.

LCWA Site:

Drill **70 new wells** (a combination of oil production, water injection, and water source wells). Construct associated oil production equipment, including an elevated pipe rack, a 28,000 barrel sales oil tank a 5,000 barrel injection water tank, two 14,000 barrel multi-use tanks, and a 20 – 25 foot high flare to be used only occasionally. Use drill rigs to establish new wells and to maintain existing wells.

I've read on the BOMP (Beach Oil Mineral Partners) website and in their press interactions where they emphasize that the project involves no drilling in a fault zone. That assurance may be technically true, but seems a bit disingenuous in the sense of giving a false sense of security, when we consider the reality that the LCWA site is merely 200 ft outside the technical parameters of the fault zone, and the Newport-Inglewood fault *does* bisect the project area and they *do* plan to run a pipeline over it.

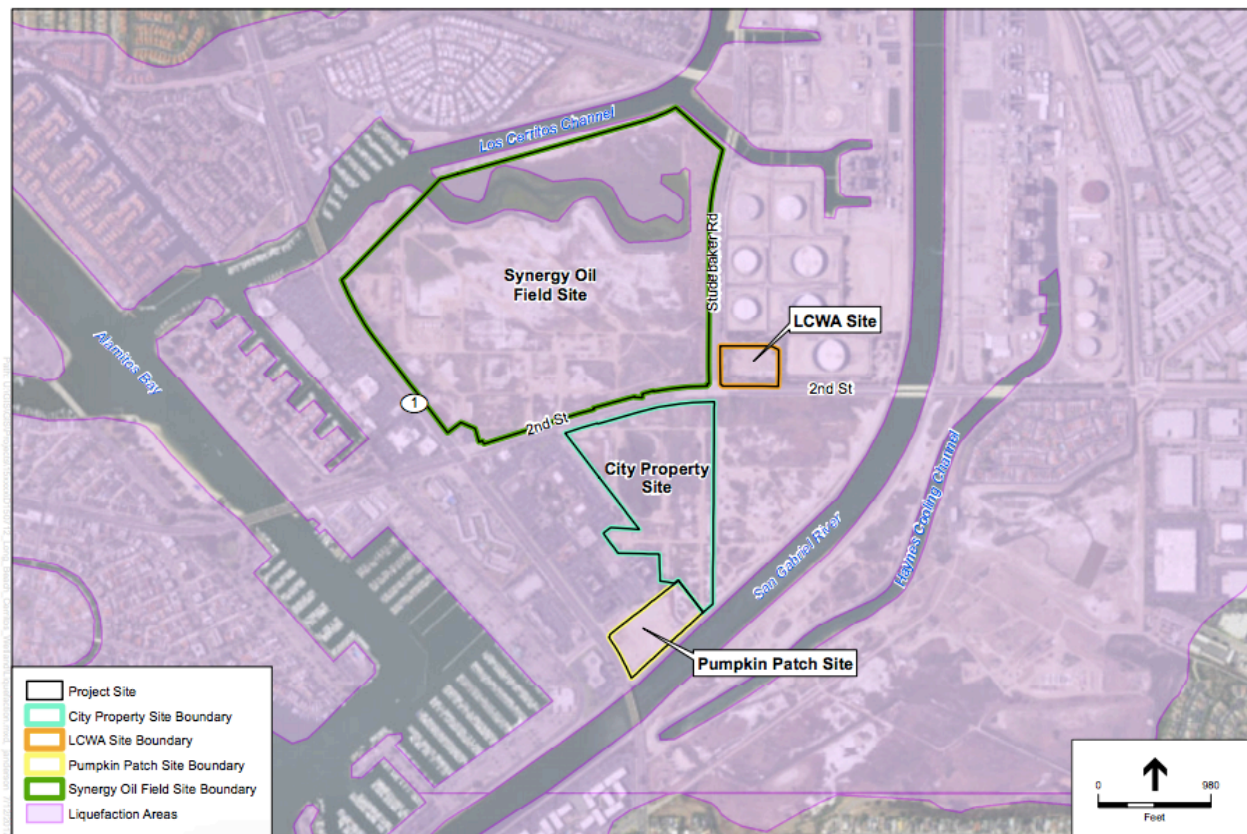


SOURCE: ESRI; City of Long Beach 2015; California Department of Conservation 2001

Long Beach Cerritos Wetland . 150712
Figure 3.5-2
 Newport-Inglewood Fault Zone

The above map illustrates that in the case of the LCWA property, the technical parameters of the “fault zone” are merely a street width outside the border of the red hatch marks demarcating the fault zone.

So, what about spill danger? We know, per developer’s response to a CC question on this point, that the worst case at the LCWA site would be *61,000 barrel spill*; worst case at the Pumpkin Patch would be a *5,000 barrel spill*; worst case for the pipeline over city property would be *30,000 gallon spill* - but this is all supposedly “mitigated” by containment schemes they assure will keep the spill on site. To me, that is tantamount to the proverbial fox assuring us that the door on the hen house is secure. They do at least concede that a major earthquake is a near certainty during the 40 year life of the project as it is currently framed. Though I have not seen anything stating they will stop extraction after 40 years. There is little doubt they will continue as long as there is oil.



In addition to the fault bisecting the project site, as this map from the EIR and associated documents shows, the entire lavender shaded area, which comprises all 4 subject properties, is a liquefaction zone, which obviously increases instability and danger.

This is not alarmist hyperbole, the hazardous nature of this fault has received a fair bit of press attention the last few years:

Newport Englewood Fault in the Press:

“Southern California’s Deadliest Quake May Have Been Caused by Oil Drilling, Study Says”

Los Angeles Times, Oct, 31 2016

Article about the 1933 Long Beach earthquake estimated at 6.4 magnitude, which remains the deadliest quake in Southern California history. It was a quake on the Newport Englewood Fault.

“But a new study suggests that the quake may have been caused by another factor: Deep drilling in an oil field in Huntington Beach.”

~~~~~

#### **“A 7.4 Quake in Southern California? A long fault Could Make it likelier”**

*New York Times, March 27th 2017*

*"The idea that the Newport-Inglewood fault could produce more powerful earthquakes than what happened in 1933 has been growing over the decades. Scientists have come to the consensus that the Newport-Inglewood fault could link up with the San Diego County coast's Rose Canyon fault, producing a theoretical 7.5 earthquake based on the length of the combined fault system.*

*"If you're on the Westside of L.A., it's probably the fastest-moving big earthquake that you're going to have locally," Jones said. "A 7 on the Newport-Inglewood is going to do a lot more damage than an 8 on the San Andreas, especially for Los Angeles."*

~~~~~

"Notorious L.A. earthquake fault more dangerous than experts believed, new research shows"

LA Times March 21, 2017

*"A new study has uncovered evidence that major earthquakes on the fault centuries ago were so violent that they **caused a section of Seal Beach near the Orange County coast to fall 16 to 3 feet in a matter of seconds.**"*

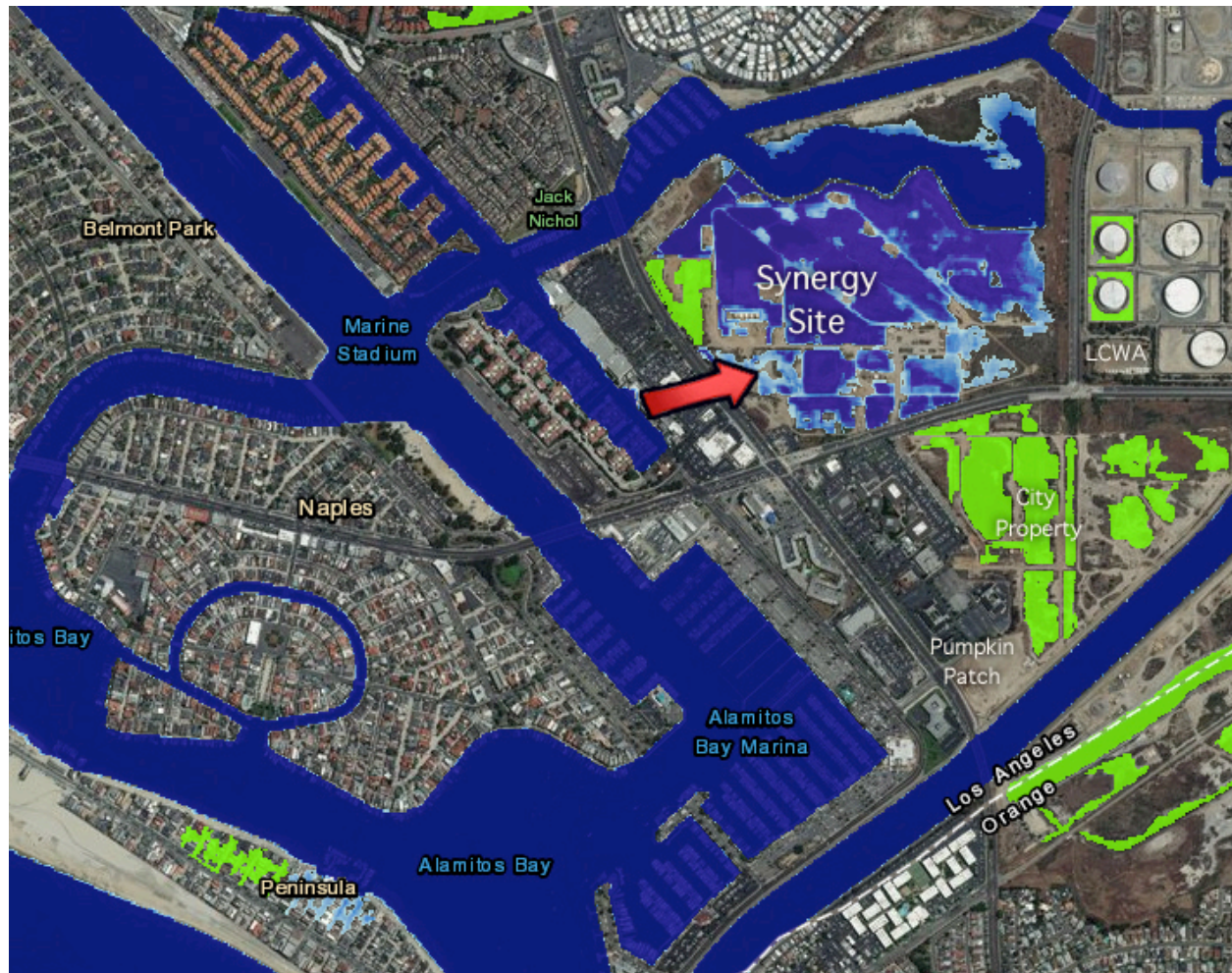
I cite these articles in order to illustrate the fact that people with geological and scientific expertise are providing data not only about the dangerous nature of this fault, but also that there is historical precedent for strong earthquakes on the fault that may well be related to oil extraction in the vicinity.

I also understand from the project proponents' responses to CC request for worst case details, as well as their response to public concern along these same lines, that they have a disaster plan in place that essentially entails catchment basins dug around their infrastructure to catch spilled oil and keep it on site.

That brings me to the next points of concern. I was very pleased to read on the Coastal Commission website that the Commission was keen to address **environmental justice** issues and **sea level rise**. I think both these issues are obviously pertinent with this project. The former because of the Native consultation issues, which is beyond the scope of this letter, but also of interest in terms of the Environmental Justice context, is that it is likely that at least some refining may take place at the nearby Wilmington and Carson refineries. These refineries have taken a terrible toll on the health of the surrounding communities, mostly lower income neighborhoods, whose air is polluted by these refineries. The latter, sea rise issue, will be addressed below.

While reading the Coastal Commission's revised draft on Sea Level Rise policy guidance, links were provided to a number of excellent sources in the document itself and in the response to questions. One of the suggested links provided by Coastal

Commission authors was the NOAA (National Oceanic and Atmospheric Administration) site with the excellent Sea Rise Modeling tools, where one can see how various levels of sea rise will impact Long Beach and indeed - the Wetlands area where this oil drilling is proposed.



Using the modeling app on the NOAA website we can see that with even a mere 1 foot of sea rise, nearly all of the Synergy property, which has the legacy oil wells and will be swapped for the LCWA and Pumpkin Patch properties as part of this “deal”, is underwater!

<https://coast.noaa.gov/slr/#/layer/slr/1/-13148730.55862909/3996593.6083144457/15/satellite/none/0.8/2050/interHigh/midAccretion>

Of course we understand that sea rise will not stop at 1 foot, and in fact increasingly scientists are warning that even some of the worst case scenarios are underestimating likely sea level rise. The level of sea rise could be much greater and also happen much quicker than previously estimated. The project proponents’ EIR worst case scenarios

cap out at 5 ft of sea rise. However, there are scientists and studies that are showing data that indicates basing decisions on a mere 5ft of sea rise may be a gross underestimation.

Here are links to 3 studies and there are dozens more making similar points:

University of Washington - 13 feet over 200 years

<http://www.washington.edu/news/2014/05/12/west-antarctic-ice-sheet-collapse-is-under-way/>

State of California study conservative 3.4 ft to worst case 10 ft by century end

http://www.oceansciencetrust.org/wp-content/uploads/2017/04/OST-Sea-Level-Rising-Report-Final_Amended.pdf

NOAA study - 8 ft by century end

https://tidesandcurrents.noaa.gov/publications/techrpt83_Global_and_Regional_SLR_Scenarios_for_the_US_final.pdf

So, even if increasingly scientists are projecting scenarios that could be far worse than 5ft, let's just take the 5 ft of rise mentioned in the EIR as a worst case... most of the project site is underwater at that point. NOAA models of 5 ft of sea rise are illustrated in this screen shot:



<https://coast.noaa.gov/slr/#/layer/slr/5/-13148730.55862909/3996593.6083144457/15/satellite/none/0.8/2050/interHigh/midAccretion>

Based on CC response to the EIR's, it seems clear that CC believes that worst case scenarios are important to consider. I agree, so along those lines, suppose that some combination of disasters ensues... say a powerful earthquake of 7.0 or above. There is historical precedent for such a quake. What if a quake causes the land to drop even a foot, instead of the 3 feet seen in the geological record for quakes on this Newport Inglewood fault as cited in the above March 2017 LA Times article? What if we get a tsunami in the wake of an earthquake? Further, let's say that happens 25 years from now when the project is well underway and we already have a modest 2 to 3 feet of sea rise, when some combination of quake and tsunami happens? The EIR did concede that a major earthquake is a statistical certainty during the life of the project. Yet they dismiss concerns because they insist their pipeline can take 5 ft of displacement and the wells and storage tank spills will be contained by spill catchment basins.

Will the catchment basins for the spilled oil also keep that oil contained when a tsunami surges into an area already impacted by even the more conservative sea level rise rates?

One simple way of avoiding an oil disaster is simply not having the conditions that could result in that type of calamity in the first place. We, the citizens of Long Beach, don't need this oil. It is also a 100% certainty that the Earth and our climate would be better off if we leave it in the ground. This project will exacerbate climate change at every stage, PLUS it has the capacity to be an ecological disaster of epic scale if the oil pipeline over the Newport Inglewood Fault, or the petroleum storage facilities with 10's of thousands of barrels of oil very near the fault are damaged. So what is the up side? Wetlands "restoration" after 40 years on the Synergy acreage, which as we've seen in the NOAA models, is under water with only 1 foot of sea rise? Millions of dollars in Profits for a few? The very real possibility of disaster doesn't justify the risk. Please stop this project and deny oil / gas development permits in the Coastal Zone.

In closing, Ms. Huckelbridge, you and the Coastal Commission may be our community's only hope. The city administrators here in Long Beach do not take climate issues or the dangers of all this extraction and infrastructure occurring on and in direct proximity to the Newport Inglewood fault seriously. Long Beach is an oil town, has been for over a century, so there is a very entrenched culture of petroleum industry coddling here. In my opinion the Coastal Act is unambiguous and provides a number of provisions which ought to prevent this oil project. In particular, Article 7 sections 30260 - 30265.5. For example, Section 30263.a.4 stipulates that permits should only be considered if, "the facility is not located in a highly scenic or seismically hazardous area".

The dangerous characteristics inherent in this geological-fault-top petroleum extraction scheme, in the midst of a liquefaction zone are self evident. It is time for the interests of the public both currently and for future generations as well as the environment, to take precedent over initiatives that profit only a few. The public good has to be the criteria here, and 200 million barrels of oil extracted on a dangerous fault and burned in the midst of a full blown climate crisis simply does not meet that criteria. It's time to be guided by long term vision and sustainability, not short term profit taking.

Thanks for your time and consideration.

Sincerely,
Steve Brothers
Long Beach, CA

July 16, 2018

To the California Coastal Commission,

My name is Connie Warner and I was born in Long Beach and grew up there. I moved away 30 years ago, retired and moved back home. I was very pleased to see they hadn't developed the oil property and wetlands. I didn't appreciate, when I was growing up, what the wetlands meant to our birds both native and migratory. Not until I moved to another part of the country and established a Certified Backyard Wildlife Habitat thru the National Wildlife Federation on our property. I am very passionate about wildlife and proud to support the Los Cerritos Wetlands Oil Consolidation and Restoration Project to preserve and restore what precious wetlands that do remain.

My husband and myself felt very fortunate when we found our home at Belmont Shores Mobile Estates. Walking along our bluff and watching the different birds in Steam Shovel Slough, we feel very privileged. Wouldn't it be wonderful for everyone to enjoy our wildlife with a path and education center in the wetlands. The benefits to wildlife and education for the future generations is immeasurable. Restoring the wetlands would be a huge win for our wildlife, while bringing in newer safer technology and operations. I would truly appreciate your consideration and approval of this very important restoration project by the Beach Oil Minerals Partners - BOMP.

Sincerely,

Connie Warner

6233 E. Marina View Dr.
Long Beach, 90803
404-668-5582

June 27, 2018

Kate Hucklebridge
California Coastal Commission
45 Fremont St., #2000
San Francisco, CA 94105



ORANGE COUNTY
COASTKEEPER®

3151 Airway Avenue, Suite F-110
Costa Mesa, CA 92626
Phone 714-850-1965
Fax 714-850-1592
www.Coastkeeper.org

RE: Los Cerritos Wetlands Oil Consolidation and Restoration Project--Support

Ms. Hucklebridge,

Orange County Coastkeeper protects and restores water resources that are swimmable, drinkable, fishable and sustainable. We are writing in support of the Los Cerritos Wetlands Oil Consolidation and Restoration Project (Project) proposed by Beach Oil Minerals Partners (BOMP). After discussions with the BOMP Project team and also touring the site, we believe that this Project is good for the Los Cerritos Wetlands. Implementation of this Project would result in the public acquisition of 154 acres of coastal wetlands in exchange for 5 acres of an industrially zoned parcel. This land swap would allow for existing oil wells to be consolidated offsite, and would result in an increase in public access due to the establishment of a visitor's center and perimeter trail. Most importantly, this Project would result in the immediate restoration of 77 acres of the Los Cerritos Wetlands. Wetlands improve water quality by filtering out contaminants, polluting nutrients and sediments. Restoration of significant portions of the degraded Los Cerritos Wetlands is important to the overall ecology of the watershed.

We would request that special consideration be provided to the appropriate tribal nation during the wetland restoration process, much like the plan that was instituted in the restoration of Playa Vista wetlands to respect and protect native burial sites and remains.

Coastkeeper is committed to the eventual elimination of dependency on fossil fuels and supports transitioning to clean energy technologies. This project consolidates the footprint of the oil drilling operation and removes drilling related material from the 77 acres of the Los Cerritos Wetlands, which are both positive actions.

We appreciate the outreach conducted and are pleased to support this Project. We hope it is approved and implemented without delay so that we can begin enjoying the Los Cerritos Wetlands. Thank you.

Regards,

Garry Brown
Founder & CEO
Orange County Coastkeeper



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Rochelle Pazanti
Dr. Richard Sax
Grace Winchell

ENDORSEMENTS

Amigos de Bolsa Chica
Algalita Marine Research
Foundation
Anza Borrego Foundation
Ballona Wetlands Land
Trust
City of Huntington Beach
City of Seal Beach
Friends of Harbors,
Beaches and Parks
Huntington Beach
Wetlands Conservancy
Huntington Beach Tomorrow
Orange Coast League of
Women Voters
Orange County
Coastkeeper
Peninsula Open Space Trust
Sea and Sage Audubon
Sierra Club
Angeles Chapter
Surfrider Foundation



June 22, 2018

Kate Huckelbridge, PhD
California Coastal Commission
Energy, Ocean Resources & Federal Consistency Division
45 Fremont St. Ste. 2000
San Francisco, CA 94105

Dear Ms. Huckelbridge,

The Bolsa Chica Land Trust offers this letter of support for the Los Cerritos Wetlands Oil Consolidation and Restoration Project proposed by Beach Oil Minerals (BOM).

We at the Bolsa Chica Land Trust work to protect and preserve the Bolsa Chica wetland ecosystem and know the challenges in restoring degraded wetlands. We believe that the oil consolidation and restoration project proposed is a good step forward in restoring the Los Cerritos wetlands for healthy wildlife habitat.

With more than 90% of our wetlands destroyed in the state of California, it is imperative that those which can be saved, are. The Los Cerritos wetlands as they exist today have immense potential to be restored and can be returned to thriving habitat essential for the success of this region's threatened species. Consolidation of the oil field will open the doors to healing this once beautiful landscape and will make a positive impact in the way of life for those who live around it.

The relocation of the oil infrastructure is imperative to a successful restoration plan, and we believe that BOM in cooperation with the Los Cerritos Land Trust and partners have developed a plan that could benefit all interests involved.

We support this project and eagerly look forward to watching these precious wetlands reach their potential.

Best regards,

Kim Kolpin
Executive Director

cc: Michael Disano, Project Manager, Beach Oil Minerals

From: [Mark Hunter](#)
To: [Coastal Los Cerritos Wetlands](#)
Cc: [Mary Parsell](#); [Kym Buzdygon](#)
Subject: Approve the Los Cerritos Wetlands Conceptual Restoration Plan
Date: Saturday, March 24, 2018 6:08:08 PM

Pasadena Audubon Society serves geographical areas that include the upper reaches of both the Los Angeles River and the San Gabriel River, two streams that meet the sea in Long Beach. In centuries past, these rivers emptied into large tidal marshes that were a vital resource for a rich variety of birds and other wildlife. Those marshes were sacrificed to progress as Southern California became more urban and industrialized. Today, tidal marshes are the rarest remnant of Southern California's original habitats.

Because of this rarity, Pasadena Audubon Society strongly supports the implementation of the Los Cerritos Wetlands Conceptual Restoration Plan, created by the Los Cerritos Wetlands Authority (LCWA).

A restored tidal marsh in the Los Cerritos Wetlands is a way for us to preserve and bolster the many species that depended on such habitat for many thousands of years. Such a marsh can also serve all of us as a quiet, restorative place to contemplate natural beauty, and as a reminder of the price that we've paid for development and progress.

Oil extraction cannot be stopped, legally, in the Los Cerritos Wetlands, But it should be relatively easy to get oil extraction facilities off the wetlands and into adjacent parcels that have less environmental value. And the Beach Oil Mineral Partners (BOMP) plan also anticipates easy relocation of oil extraction facilities. This will enhance the environmental value of the Los Cerritos Wetlands even more.

Los Cerritos Wetlands can once again be the biologically rich area that it was for thousands of years. Pasadena Audubon Society and its 1,300 members urge the support of the Conceptual Restoration Plan and approval of the EIR for the BOMP oil extraction relocation plan.

Mark Hunter
Conservation Chair
Pasadena Audubon Society

From: [Nathan Krall](#)
To: [Coastal Los Cerritos Wetlands](#)
Subject: Support
Date: Friday, March 02, 2018 10:20:40 PM

I support los cerritos wetlands restoration/ oil consolidation project. It is not expectable to leave the oil operations in the current state that threaten the wetlands.

Sincerely Nathaniel Krall

From: [cec1174](#)
To: [Coastal Los Cerritos Wetlands](#)
Subject: Fwd: Wetland Project
Date: Monday, March 05, 2018 6:53:33 AM

----- Original message -----

From: Kyle Taylor <xxl.k.t.lxx@gmail.com>
Date: 3/2/18 10:10 PM (GMT-08:00)
To: loscerritoswetlands@costal.ca.gov
Cc: n8krall@gmail.com
Subject: Wetland Project

To whom it may concern,

I want to let you know I support the restoration and oil consolidation project for the Los Cerritos Wetlands.

Sincerely,

Long Beach resident
Kyle Taylor

LOS CERRITOS WETLANDS RESTORATION COMMENTS

GTIC comments and consultation with other tribal groups

Even as a young boy, I have been involved with protecting the Ancestors with my father and for more than 40+ years have worked as a consultant and monitor. I was appointed as a Most Likely Descendant by the California Native Heritage commission to be entrusted in caring for our ancestors if they are uncovered or disturbed by development or other soil disturbances or removal. Protecting these sites has been my life's work.

Though I am not a hydrologist, I do have a concern about any determination as to whether the wetlands would be affected by either segregating a portion of the wetlands for public use and education as well as the wildlife and native plants that may have survived all the oil company use over the decades. Would tinkering with the existing footprint cause the water to disappear from the area? Would it come back if it were to be "restored"? If Synergy states that they want to separate the fresh water from the salt water, will that leave the fresh water on the north side of the road and the salt water on the south side of the road? I would think that for wetlands to work the way they naturally do without any human interference would be to allow the salt and fresh water to do what always happens in an estuary connected to the ocean and that is that there would always be an overlap between these waters. Even though the company is suggesting they will continue to preserve the path of fresh water to the wetlands, can they promise that new drilling and changing out outdated equipment will not cause the water flow to stop or move to a new footprint? Can they guarantee that oil/gas drilling will not cause a situation such as the catastrophe that is ongoing at Porter Ranch? I am certain the intent of Southern California Gas was not to expect the leaks to be so dangerous to the surrounding community, but it was and still is.

In addition to my concerns about the physical impact on the land, I have contacted members of a few of the groups that are also concerned about this project.

Cindi Alvitre: It would be best to leave the Wetlands in their present state.

Desiree Martinez: I've reached out to some Long Beach State students and they all agree it would be in the best interest to not develop the area.

Anthony Morales: We want it to be left alone. The EPA should clean it up.

Compiled by Jon Dorame, Gabrielino Tongva Indians of CA council member

From: [Willis, Andrew@Coastal](mailto:Willis.Andrew@Coastal)
To: [Posner, Chuck@Coastal](mailto:Posner.Chuck@Coastal)
Cc: [Coastal Los Cerritos Wetlands](#)
Subject: FW: Dorame comments on wetlands physical condition
Date: Thursday, February 15, 2018 3:05:13 PM
Attachments: [los cerritos wetlands restoration comments, physical.docx](#)

From: Robert Dorame [mailto:gtongva@gmail.com]
Sent: Wednesday, February 14, 2018 4:53 PM
To: Christopher Koontz
Cc: Totton, Gayle@NAHC; Willis, Andrew@Coastal; Jon Dorame
Subject: Dorame comments on wetlands physical condition