

**CALIFORNIA COASTAL COMMISSION**

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# W12d

## ADDENDUM

DATE: October 7, 2025

TO: Commissioners and Interested Persons

FROM: Peter Allen, Transportation Program Manager  
Marlene Alvarado, Senior Transportation Analyst

SUBJECT: **ADDENDUM TO ITEM W12d, CDP APPLICATION NO. 5-25-0393 FOR THE COMMISSION MEETING ON WEDNESDAY, October 8, 2025.**

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This addendum is designed to achieve the following objectives. First, Section I addresses correspondence that Commission received after the staff report was issued. Second, Section II makes revisions to the staff report.

### I. RESPONSE TO PUBLIC CORRESPONDENCE

The following response public comments is hereby incorporated as a "Response to Comments" section of the staff report dated September 26, 2025 (as Section IV.H, thus renumbering the following 'California Environmental Quality Act' subsection as Section IV.I).

On October 3, 2025 (supplemented on October 5, 2025), the Commission received a letter from the Sierra Club and the Los Cerritos Wetlands Task Force expressing concerns about the City of Long Beach's proposed landscaping and tree replanting plan. This correspondence is posted to the Commission's website as 'Correspondence' for this item. As noted in the staff report, the City intends to plant 522 trees as part of the West Shoreline Drive Minor Realignment project, including 278 natives and 244 other trees. The correspondents note that most of the selected tree species and shrubs are not native to California, nor suitable for nesting or roosting by local coastal wading birds such as Great Blue Herons and Egrets. The correspondents challenge the City's classification of the *Chilopsis linearis* trees as "native", which would make up 194 of the replanted trees. The correspondents also emphasize the risks of monoculture, lack of salt tolerance, and the absence of habitat value in most of the City's selected species. Additionally, concerns are raised about the mandatory use of drip/microspray irrigation without deep watering if potable water is used, which could jeopardize both new and mature trees, especially during drought conditions.

The correspondents call for a revised plan that prioritizes salt-tolerant, bird-friendly tree species and suggest White Alder, River She Oak, and various Eucalyptus species known to support nesting by coastal birds in Long Beach.

The following clarification and comments are provided regarding the City's proposed tree replacement plan:

Commission staff have been in ongoing discussions with the City and the public correspondents regarding the proposed tree removal and replanting plan, working collaboratively to identify the most appropriate solution for this location. As part of this effort, the City's original proposal to remove 65 trees was reduced to 21, all of which are non-native species. Staff also coordinated with the City to revise the tree planting palette. As a result of these proposed changes, the landscaping plans reviewed by the correspondents are now slightly outdated. With the incorporation of Special Condition 2, the applicant is required to submit final revised landscaping plans reflecting the updated tree planting proposal. Additionally, these plans must be reviewed and approved by Commission staff and must ensure that all proposed trees and other vegetation are non-invasive and meet all specified criteria.

As noted in the staff report, "*the City's plant palette was carefully selected based on species that are non-invasive, drought-tolerant, compatible with local salinity levels, and proven to thrive in the Long Beach coastal environment.*" The revised tree species list will also be consistent with the City's tree policy list, which was approved by the Commission under CDP 5-08-187.

The Commission's ecology unit considers the 278 trees to be native trees. The City is proposing to replace 84 pine trees with *Platanus racemosa* (California sycamore), a species native to California. In addition, the City has proposed planting 194 *Chilopsis linearis*, more commonly known as Desert Willow, which is native to California's southern desert regions. Together, these plantings would result in 278 native trees, comprising more than 50% of the total 522 trees proposed for the project.

While the City initially and mistakenly referred to *Chilopsis linearis* by the common name "Desert Museum" in the plans, they have since clarified that this should have read "Desert Willow," which, as noted, is native to southern California.

Regarding the use of species not included in the City's Street Tree List, the City has already agreed, based on the recommendation of the City Arborist, to replace *Arbutus marina* (Marina strawberry tree) and pink melaleuca with *Melaleuca linariifolia* (flaxleaf paperbark) and *Agonis flexuosa* (peppermint tree), respectively. These trees do now comply with the City list.

The public correspondence also includes requests for the planting of certain trees, some of which are considered invasive such as *Eucalyptus globulus* and *Myoporum laetum*, and are therefore not appropriate for the coastal environment.

Regarding the suitability of proposed tree species, *Platanus racemosa* (California sycamore) is moderately salt tolerant, particularly when irrigation is available. Given that

these trees will be irrigated, their removal from the City's revised species list for the project is not necessary.

Additional native and moderately salt-tolerant species have been identified for consideration. These include *Washingtonia filifera* (California fan palm) and *Quercus agrifolia* (Coast live oak). Other appropriate smaller trees and large shrubs include *Prunus ilicifolia* (Hollyleaf cherry), which is evergreen and moderately salt tolerant, *Frangula californica* (California coffeeberry), and *Heteromeles arbutifolia* (Toyon). These species offer ecological value and are generally well-suited to coastal conditions.

Regarding irrigation, the Coastal Commission typically encourages the use of reclaimed water for irrigation purposes. When potable water is used, the Commission generally limits its use to efficient systems such as drip or microspray irrigation. Additional water conservation measures, such as weather-based irrigation controllers, may also be considered. To support successful tree and vegetation establishment, the City may consider measures such as increasing the number of drip emitters and extending irrigation duration.

In response to the correspondents' request, staff acknowledges the value of implementing a monitoring program to track the health of the proposed trees and shrubs, and to ensure replacement of any trees that do not survive. Accordingly, modifications have been made to Special Condition 2, as outlined in Section II of this addendum.

## **II. CHANGES TO STAFF REPORT**

The following modifications are made to the staff report dated September 26, 2025. These changes do not substantively modify the staff report findings nor alter staff's published recommendation. Thus, the following modifications and corrections are made to the staff report, where language to be added is shown in underlined text, and language to be deleted is identified by ~~striketrough~~.

- a. Revise Special Condition 2.C in Section III (Special Conditions), on staff report page 7 as follows:

Trees shall be selected from the Approved Street Tree List in accordance with the City of Long Beach's Tree Trimming and Removal Policy as outlined in CDP No. 5-08-187 and LCDP Nos. LCDP20-033 and LCDP21-015, except where such selection would conflict with the provisions described above in ~~4.A.12.A~~ and ~~4.A.22.B~~ of this condition.

- b. After Special Condition 2.D in Section III (Special Conditions), on staff report page 8, add the following:

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E. All landscaped areas on the project site shall be maintained in a litter-free, weed-free, and healthy growing condition throughout the life of the project.

F. Five years from the date of the issuance of the coastal development permit, the Permittee shall submit for the review and written approval of the Executive Director a landscaping monitoring report, prepared by a licensed Landscape Architect or qualified resource specialist, that certifies whether the on-site landscaping is in conformance with the landscape plan approved pursuant to this special condition. The monitoring report shall include photographic documentation of plant species and plant coverage. If the landscape monitoring report indicates the landscaping is not in conformance with or has failed to meet the performance standards specified in the landscaping plan approved pursuant to this permit, the Permittee shall submit a revised or supplemental landscape plan for the review and written approval of the Executive Director. The revised landscaping plan must be prepared by a licensed Landscape Architect or qualified resource specialist and shall specify measures to remediate those portions of the approved landscaping plan that have failed or are not in conformance with the original approved plan.

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