

CALIFORNIA COASTAL COMMISSION

South Coast District Office
301 E Ocean Blvd., Suite 300
Long Beach, CA 90802-4302
VOICE (562) 590-5071



Th17e

5-24-0767 (LONG BEACH YACHT CLUB)

AUGUST 8, 2025

CORRESPONDENCE



MAYOR REX RICHARDSON

August 8, 2025

California Coastal Commission
Chair Meagan Harmon and Honorable Commissioners
455 Market Street, Suite 300
San Francisco, CA 94105-2219

Subject: Support for Long Beach Yacht Club Modernization Project (Agenda Item 17(e), August 14, 2025 Coastal Commission Meeting)

Dear Chair Harmon and Honorable Commissioners,

I support the approval of application number 5-24-0767, item 17(e), coming in front of the California Coastal Commission on August 14th for the modernization project at the Long Beach Yacht Club.

The Long Beach Yacht Club which was established in 1929 and is a recognized leader in the international yachting community, is well known for its commitment to excellence in yacht racing and has been a strategic partner in building the brand of our city as both as the “Aquatic Capital of America” as well as “The International City”. LBYC has served not only its members, but also the broader public through sailing education, waterfront access, and support for local youth and nonprofit organizations.

The proposed modernization of its aging facilities is a thoughtful project that underscores the club’s commitment to public benefit. The plans include a dedicated Community Room available to nonprofit organizations across the region, free sailing classes for local youth, and more opportunities for public access to the coast and ocean.

The application also addresses the transportation, environmental, and operational considerations required by the Coastal Act. It balances the needs of club members, boaters, labor, and surrounding neighborhoods while advancing its mission of community service.

The Long Beach Yacht Club is a long-standing institution in our city and has a proven track record of positive stewardship of our collective coastal resources. Thus, I strongly support the approval of this project and hope the Commission will recognize the value it will bring to our residents and community.

Sincerely,

Mayor Rex Richardson
City of Long Beach

California State Senate

STANDING COMMITTEES

EDUCATION

ENERGY, UTILITIES
& COMMUNICATIONS

ENVIRONMENTAL QUALITY

HEALTH

TRANSPORTATION

JOINT COMMITTEES

LEGISLATIVE AUDIT

RULES

SELECT COMMITTEES

PORTS AND GOODS MOVEMENT
CHAIR



SENATOR LENA A. GONZALEZ

THIRTY-THIRD SENATE DISTRICT

SENATE MAJORITY LEADER

August 06, 2025

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

Re: Item 17(e) Long Beach Yacht Club Modernization Project

Dear Honorable Chair Harmon, Commissioners, and Staff,

As the State Senator proudly representing Long Beach and the 33rd Senate District, I write in support of Item 17(e) regarding the modernization project at the Long Beach Yacht Club (LBYC) on the August 14th Coastal Commission Agenda.

For nearly a century, LBYC has been a valued community institution, serving generations of sailors, families, community groups, and nonprofit organizations throughout the Long Beach region. The proposed modernization of its 1960s-era facilities will ensure that LBYC can continue fulfilling its mission—centered on education, boating access, and service to the community.

The project reflects a balanced effort that incorporates the needs of club members, the broader boating community, local labor, neighborhood stakeholders, and environmental considerations. Preserving environmental integrity and equitable coastal access are non-negotiable priorities for me and the communities I represent.

Among the many public benefits included in the proposal is a new Community Room for use by local nonprofits, free sailing programs for youth, and initiatives to improve coastal access for underserved communities. Additionally, the LBYC has committed to offering incentives to members using alternative forms of transportation as to not further impact residents, or the environment, with its expansion.

I respectfully urge the Coastal Commission to approve this project, which I believe will continue to enhance the vitality, accessibility, and civic value of our coastline. Please do not hesitate to contact my office at (562) 256-7921 should you have any questions regarding my support.

Sincerely,

A handwritten signature in black ink, appearing to read "Lena Gonzalez".

Lena Gonzalez
Senator, District 33

August 7, 2025

Dear Commissioners and Staff:

I am writing to express my strong support for the approval of the application now pending before the California Coastal Commission regarding the modernization project at the Long Beach Yacht Club (LBYC). LBYC has been an invaluable community institution for nearly 100 years and has served the interests of sailors, community groups, families and non-profits throughout the Long Beach region. Modernization of their 1960 s era facilities will allow LBYC to continue its community focused mission on education, boating, access to the water and increased social capital that has helped define its operations since 1929.

In reviewing the application materials, it is clear that the project before you meets and exceeds the Coastal Commission s criteria for successful development. It balances the needs of club members, the broad boating community, neighborhood groups, labor and other stakeholders and furthers the LBYC s commitment to delivering exemplary benefits to the Coastal California community. These benefits will include a new dedicated Community Room open to non-profit organizations throughout the region, free sailing classes for the youth of Long Beach and assistance with access to the Coast and Pacific Ocean. The project is also sensitive to the transportation, environmental and operational impacts of the development process and in the finished project.

I strongly support the approval of this project and look forward to the Coastal Commission s support of this vital community institution.

Regards,

*Lee Coller
Commodore, Southern California Yachting Association
commodore@scya.org*

LINDA RAHN
5659 E The Toledo, Long Beach, CA 90803

August 6, 2025

To: California Coastal Commission

RE: Long Beach Yacht Club Renovation Project

Dear Members of the California Coastal Commission,

As a proud and engaged member of the community, I'm writing to share my strong support for the modernization project currently under review for the Long Beach Yacht Club (LBYC). For nearly a century, LBYC has been a cornerstone of our coastal community — bringing people together through sailing, education, outreach, and shared access to the water.

The proposed updates to LBYC's aging 1960s facilities are not just about modernization — they're about continuing a legacy of service, learning, and inclusion that has benefited families, youth, and local organizations across Long Beach for generations.

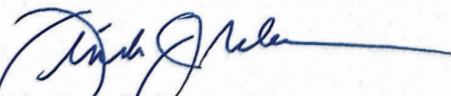
After reviewing the application materials, it's clear that this project thoughtfully addresses the values and priorities of the Coastal Commission. It strikes a careful balance between honoring tradition and embracing the future — supporting club members, while also expanding opportunities for nonprofits such as the **YMCA, Rotary Club of Long Beach, Fisher House Southern California, the Long Beach Public Library Foundation**, young sailors, and the broader community.

The addition of a dedicated Community Room and free sailing programs for local youth are just a few examples of how this project enhances public benefit and coastal access in meaningful ways.

Moreover, the plans reflect a genuine commitment to minimizing environmental and transportation impacts, ensuring the project aligns with the spirit and standards of responsible coastal development.

I wholeheartedly support the approval of this project and hope the Commission will recognize the lasting, positive impact it will have on our community.

Warm regards,



Linda J. Rahn
Volunteer Member, Board of Directors,
Rotary Club of Long Beach
LRahn@me.com



For the Attention of the California Coastal Commission

6 August 2025

Dear Commissioners and Staff

I am writing on behalf of the World Match Racing Tour, Special Event of World Sailing, to express our strong support for the approval of the application now pending before the California Coastal Commission regarding the modernization project at the Long Beach Yacht Club (LBYC).

As a founding partner of the World Match Racing Tour in 2000, LBYC is one of the most internationally regarded yacht clubs for hosting world class sailing and international match racing events including the annual Congressional Cup. The club and its many active members and volunteers have continually set an example of how to serve the interests of local and international sailors, as well as community groups, families and non-profits throughout the Long Beach region for nearly 100 years.

Modernization of LBYC's 1960's era facilities will allow the club to continue its valued community focused mission on education, boating, access to the water and increased social capital that has helped define its operations since 1929. It is clear the project meets and exceeds the Coastal Commission's criteria for successful development, as well as balancing the needs of club members, the broad boating community, neighborhood groups, labor and other stakeholders.

We understand the project will also benefit from a new dedicated Community Room open to non-profit organizations throughout the region, free sailing classes for the youth of Long Beach and assistance with access to the Coast and Pacific Ocean, an initiative we wholly support.

We strongly endorse the approval of this project and we look forward to the Coastal Commission's support of this vital community institution, and international club facility.

Kind regards,

A handwritten signature in black ink, reading "James Pleasance".

JAMES PLEASANCE
CEO | World Match Racing Tour

Allan R. Rahn
allanrrahn@gmail.com

7 August, 2025

To: California Coastal Commission

Re: Renovation Project, Long Beach Yacht Club

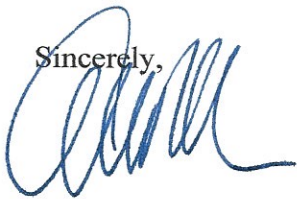
As a long-time member of the Long Beach Yacht Club (LBYC) and someone who cares deeply about our local community, I want to express my enthusiastic support for the Club's proposed modernization project currently before you.

The Long Beach Yacht Club has been part of the fabric of Long Beach for nearly 100 years. It's more than just a place to sail. It's a gathering space that brings together families, youth programs, community groups, and nonprofits. The planned updates to the Club's 1960s-era facilities are long overdue and will help ensure that LBYC can continue serving our community for generations to come.

What I really appreciate about this project is how thoughtfully it's been planned. It meets the California Coastal Commission's goals and goes beyond by offering real community benefits such as a new Community Room for local nonprofits, free sailing classes for Long Beach youth, and improved access to the coast. The project also takes into account important environmental and transportation considerations, which I know are priorities for everyone involved.

LBYC has always been about more than boating. It's about connection, learning, and access to the water for all. This project builds on that mission, and I truly hope you'll give it your full support.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Allan Rahn', with a stylized, flowing script.

Allan Rahn
Long Beach Yacht Club member since 2017

From: [Ziff, Dani@Coastal](mailto:Ziff_Dani@Coastal)
To: [Vaughn, Shannon@Coastal](mailto:Vaughn_Shannon@Coastal)
Subject: Fw: Please DENY Long Beach Yacht Club doubling the size of its Clubhouse/Pool Structure (California Coastal Commission, August 14, 2025, Agenda Item 17e)
Date: Friday, August 8, 2025 10:38:03 AM
Attachments: [LBYC Membership Application Procedure.2.pdf](#)

From: Melinda Cotton <mbcotton@hotmail.com>
Sent: Thursday, August 7, 2025 5:08 PM
To: Energy@Coastal <EORFC@coastal.ca.gov>
Cc: SouthCoastal@coastal.ca.gov <SouthCoastal@coastal.ca.gov>
Subject: Please DENY Long Beach Yacht Club doubling the size of its Clubhouse/Pool Structure (California Coastal Commission, August 14, 2025, Agenda Item 17e)

To: California Coastal Commissioners

Re: August 14, 2025, Agenda Item 17e)

The private, exclusive, expensive Long Beach Yacht Club (LBYC), in all fairness, should not be allowed to double the size of its Clubhouse/Pool Structure from the existing 21,026 sq. ft. to 41,205 sq. ft. As you'll see from the photo below, the LBYC is located on an incredibly valuable, beautifully situated Alamitos Bay Naples Marina Long Beach City owned location. The LBYC has an existing City lease extending to the year 2050 on the 89,571 sq. ft. project site. The LBYC is currently in negotiations asking for a lease extension ("...it is anticipated that the new lease will extend beyond 2090.") And we're told the LBYC pays only \$1625.00/month currently for the site.

Allowing the doubling of LBYC's size will provide no public coastal visitor benefit, and in fact will further jeopardize and hinder the Commission's Environmental Justice Policy of ensuring California's coast is accessible to all Californians and especially the "underserved and disadvantaged communities". (The Long Beach Yacht Club has no public access component.)



LBYC's Membership requirements (*attached*) make it clear that the LBYC is only available to the wealthy and connected. (*Regular Membership Initiation Fee: \$12,500* Monthly Dues: \$ 455 (\$380 dues; \$75 reserve) Food & Beverage Minimum: \$ 240 (Quarterly)(Sponsorships' and 'Applicant Investigation' required)*)

Even though no Environmental Impact Study was done, the negative impacts of the LBYC expansion on Coastal Access (traffic, public parking, etc.) are clear.

Parking

- * The existing Yacht Club lease grants 72 members-only parking spaces inside a private gated parking lot adjacent to the building.

- *46 LBYC boat owners with slips are currently allowed 4 parking permits each, for a total of 184 spaces in the adjacent Basin 4 Parking Lot (316 space capacity) A LBYC parking demand analysis "...concluded that there would

not be enough private onsite parking for the existing and proposed demand.” (And it’s noted “... utilizing the Basin 4 public parking lot for private purposes would adversely impact the public’s ability to use the Basin 4 public parking lot.”

*LBYC says it has a “long-term lease with a nearby hotel site for 80 parking spaces”, but the hotel is the Golden Sails, (an inconvenient 1.8 miles walking distance away per Google maps!).

*The LBYC has provided no Transportation Demand Management Proposals.

*The Parking Demand Analysis prepared by Linscott Law and Greenspan in 2023 over two days showed a ‘conservative’ 30% increase in parking Demand by the Yacht Club. No Parking Study was done considering the needs of Coastal Visitors and adjacent residents.

Traffic

*The expansion of the LBYC will also impact traffic on 2nd Street, the only major access to Appian Way and the LBYC. With some 35,000 vehicle trips a day, 2nd Street is the major thoroughfare connecting the city's southeast neighborhoods to Pacific Coast Highway (PCH) on the East and to Ocean Blvd West to downtown Long Beach. 2nd Street through Naples and 2nd & PCH is heavily congested during commute hours, weekends and special events. Two narrow bridges constrict traffic, making them a traffic choke in emergencies. The City has failed to act on [Assembly Bill 747](#) requiring local governments to publicly comply with the 2019 law requiring it to analyze the capacity, safety and viability of its evacuation routes. With three large multi story housing projects coming to PCH soon, traffic and evacuation routes should have been carefully studied.

Again, I ask that the Coastal Commission **deny** the doubling in size of the Long Beach Yacht Club Main Building/Clubhouse/Pool complex. The City of Long Beach has been extremely generous in the location and lease agreements it has granted to the LBYC through the years, and that lease agreement will continue until 2050 and beyond. But Coastal Visitors, the general public and the underserved and disadvantaged communities will lose out if this 20,179 sq. ft. expansion is allowed.

Sincerely, Melinda Cotton
42 year resident of Belmont Shore

LONG BEACH YACHT CLUB

6201 E. Appian Way, Long Beach, CA 90803
Tel: 562.598.9401 * Fax: 562.430-8471 * lbyc.org * membership@lbyc.org

MEMBERSHIP APPLICATION INFORMATION

The following are the basic requirements for membership in the Long Beach Yacht Club:

- Any person over the age of 21 is eligible for election to the Club as a Regular Member.
- Any person ages 18-37 is eligible for election to the Club as an Intermediate Member. Intermediate Members shall be reviewed by the Membership Committee and Board of Directors annually.
- It is a requirement that anyone interested in applying for membership in Long Beach Yacht Club be sponsored by three sponsors. If the primary sponsor is a non-voting member, then four sponsors are required.
- All sponsors must be a member in good standing for a minimum of two years.
- The sponsors are expected to know the prospect well, to be aware of their boating experience and verify the applicant is of sound character.
- Children and grandchildren through age 26 (if they are still dependent on the member) and the Spouse of each member have privileges through the individual membership. There are no joint, family, or corporate memberships.
- Upon receipt of the application, it is logged in and processed according to the date of receipt. The month following receipt, the member application is posted in our newsletter and on our notice board for 30 days.
- The Membership Committee will thoroughly investigate all applicants and recommend approval or denial of membership to the Board who will make final determination of acceptance or denial. Normal application processing time is approximately three months.
- Applications for consideration should be **complete** and delivered to the Front Desk.
- Incomplete applications will be returned to the primary sponsor which will delay approval time.
- **Please be sure all elements are included prior to submission.**
 - Completed application including all sponsor signatures.
 - Letter of interest which states your reason for joining the Club.

- Letters of recommendation from all sponsors responding to the following prompts:
 - *How long have you known this applicant? Socially? Business?*
 - *Are you acquainted with their spouse and children?*
 - *In what yachting activities does this applicant now participate?*
 - *In what LBYC activities do you think this applicant will be participating if accepted?*
 - *Have you informed the applicant of the financial obligations of the Club?*
 - *What yachting activities have you and the applicant enjoyed together?*
 - *Additional comments you wish to make regarding this applicant.*
- A recent photo.
- A \$100 non-refundable application processing fee payable to LBYC.

Regular Membership

Initiation Fee:	\$12,500*
Monthly Dues:	\$ 455 (\$380 dues; \$75 reserve)
Food & Beverage Minimum:	\$ 240 (Quarterly)

* can be paid over 2 years at a 10% interest rate

Intermediate Membership (Ages 18-39)

To qualify as an intermediate member, you must join by year-end of your 37th birthday.

Initiation fee:	
↪ Ages 18-27	\$ 625
↪ Ages 28-32	\$1,250
↪ Ages 33-37	\$1,875
Monthly Dues:	
↪ Ages 18-27	\$ 113.75 (\$95 dues; \$18.75 reserve)
↪ Ages 28-32	\$ 227.50 (\$190 dues; \$37.50 reserve)
↪ Ages 33-39	\$ 341.25 (\$285 dues; \$56.25 reserve)
Quarterly F&B Minimums:	
↪ Ages 28-32	\$ 87
↪ Ages 33-39	\$ 150

Intermediate Member Transfer Fund**:

- ↪ 50% of monthly dues

** Transfer fee amount will be fixed at the date of Intermediate Membership or current transfer rate whichever less is. Any surplus in the member's fund over required conversion cost (transfer fee and member equity acquisition cost) will be retained by LBYC.

FOOD AND BEVERAGE MINIMUM

Long Beach Yacht Club has a food and beverage minimum per quarter. Only dining and bar purchases charged to your account will be credited to the minimum. Please note that this does not include service fee, tax, or wellness fee.

The quarter ends on the last day of the months indicated below, based on the first letter of the member's last name.

A – F:	January, April, July, October
G – O:	February, May, August, November
P – Z:	March, June, September, December

The monthly billing statement reflects the amount of unused minimum remaining for the quarter. Should you not spend your minimum requirement on food or beverages by the end of your designated quarter, the amount unused will then be charged to your account.

From: SouthCoast@Coastal
To: [Vaughn, Shannon@Coastal](mailto:Vaughn,Shannon@Coastal)
Subject: FW: Public Comment on August 2025 Agenda Item Thursday 17e - Application No. 5-24-0767 (Long Beach Yacht Club, Long Beach)
Date: Friday, August 8, 2025 5:07:45 PM

From: nancy Okada <nxxokada@gmail.com>
Sent: Friday, August 8, 2025 4:55 PM
To: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>
Cc: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Public Comment on August 2025 Agenda Item Thursday 17e - Application No. 5-24-0767 (Long Beach Yacht Club, Long Beach)

Please send proof of receipt. Thank you.

To: CA Coastal Commission
From: Sierra Club CA
Re: Agenda Item Th 17e,
CCC August 2025
Application No.: 5-24-0767
Applicant: Long Beach Yacht Club; Commodore Scott Dixon
Agent: Michael Kollin, AIA
Location: 6201 Appian Way, Long Beach, Orange County (APN: 7242-014-900)
Project Description: The project includes the remodel of and addition to the existing 21,026 sq. ft. Long Beach Yacht Club Main Building/Clubhouse, which also includes the demolition of the adjacent existing pool and pool deck and construction of a new attached three-story Pool Building with a new pool and deck, multipurpose rooms, restrooms, classrooms and terraces. The additions total 20,179 sq. ft. for an overall post project total of 41,205 sq. ft. Grading will consist of 207 c.y. of cut and 54 c.y. of fill for recompaction purposes. Any remaining grading from the cut will be exported to a location outside of the Coastal Zone.

Concerns

Staff states the primary issues raised by this project concern protection of public access and water quality. **We will comment on public access, parking, construction staging, bird safety, equity, and CEQA concerns.**

Public Access: reduced public parking in lot and in neighborhood,, LB Yacht Club is a private club operating in a public structure on public property, essentially limiting access to this section of the waterfront to members only. During construction access to recreational sites, including Mother's Beach, marina boat slips, and to the neighborhood will be impeded.

Coastal Resources: Biological Impacts include negative impacts on coastal bird rookery in adjoining marina parking lot

Equity/Environmental Justice: Although the State owns the tidelands property and the City owns the structure, membership in the Yacht Club is, with few exceptions, limited to the wealthy. Expansion of the structure provides no public benefit to Long Beach residents or coastal visitors. The facility is not open to the public and yacht club membership fees and dues are prohibitive. Additionally, there has been an orchestrated lack of opportunity for public comment on a project on public lands due to City's denial of CEQA/EIR.

CEQA: In denying a full CEQA review, the City of Long Beach fast-tracked a major construction project that will have significant short and long-term impacts on our public lands, public waters, and

community.

PUBLIC ACCESS

PARKING

Special Condition 15 requires a Final Transportation Management Program (TDMP), however, the suggestions are all voluntary and do not prevent Yacht Club members or employees from parking in the Basin 4 Public Parking Lot (with 316 parking spaces) adjacent to the Yacht Club or on public streets in the neighborhood. Public parking in both the public lot and in the neighborhood will be impacted by this expansion. A parking demand analysis concluded that there would not be enough private onsite parking for the existing and proposed demand. Permanent staff, who currently park in the public lot, is expected to double in size to 160 employees. Additionally, the public will be unlikely to find parking spaces in public lots or on adjacent streets during Special Events (ten a month, along with ten additional large sailing competition events per year). The club's private parking lot has just 72 spaces, and City Planning documents show that as many as 284 spots would be required during special events. Also, during construction, workers will need parking. The Yacht Club has indicated that they have secured additional offsite parking through a long-term lease for eighty parking spaces available at the Golden Sails Hotel (6285 E Pacific Coast Hwy, Long Beach, CA 90803), as another source to provide parking to meet demand generated by the Yacht Club. There is no mention of how members or employees will travel the mile from the motel to the Yacht Club. Proposing that members and staff voluntarily use alternative means of transportation is unrealistic and demands no accountability on the part of the club or the City.

We advise that the Long Beach Yacht Club be required to provide off site parking for employees (without charge), for members and their guests, and for any and all attendees and any Long Beach Yacht Club events.. A shuttle service should be provided at no charge to employees. During construction, off site parking must be secured for all construction equipment and the vehicles of construction workers.

"Off-site" meaning a parking lot other than Alamitos Bay

Marina, Mother's Beach, and Marine Stadium public lots, and not on the public streets.

CONSTRUCTION STAGING PLAN

Special Condition 17. Final Construction Staging Plan.

A. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit for the review and approval of the Executive Director, two (2) full size sets of a Final Construction Staging Plan that indicates that the construction staging area(s) and construction corridor(s) will minimize public access impacts to the sandy public beach.

(1) The plan shall demonstrate that:

- (a) Construction equipment, materials or activity shall not occur outside the staging area and construction corridor identified on the site plan required by this condition;
- (b) Construction equipment, materials, or activity shall not be placed outside of the construction staging area or corridor identified in subsection (a) of this special condition, including but not limited to, in any public parking lot, or within the adjacent public walkway at any time;
- (c) The construction staging area will gradually be reduced as less materials and equipment are necessary;
- (d) The construction access route will only be intermittently closed for transport of equipment and materials. When not in use for transportation of equipment and materials, it will be made available for undisrupted public access;
- (e) No construction staging shall take place in the public walkway adjacent to Alamitos Bay that fronts the Yacht Club nor in the Basin 4 public parking lot. Additionally, no construction staging areas shall be located near these areas that will impact the ability of the public to access them.

It is important to have Staging Area Plans before approval of this project. In looking at the site, there is very little space for demolition and construction machines and materials other than in the parking lots, which have been eliminated.

BIOLOGICAL IMPACTS ON COASTAL RESOURCES

In the public marina parking lot and along the parkways adjoining the Long Beach Yacht Club there is a well-established coastal bird rookery and nesting site for Black Crowned Night Herons, Yellow Crowned Night Herons, Snowy Egrets, and Great Blue Herons. Year-round roosting and seasonal nesting occurs in trees located throughout Basin Lot 4, in the roundabout, and in trees on the parkways (along the Bay and on Appian Way). Many of these nesting and roosting sites are 600+ ft from the project site. **Special Condition 6, Storage of Construction Materials Mechanized Equipment and Removal of**

Construction Debris states that (1) No demolition or construction materials, equipment, debris, or waste shall be placed or stored where it may enter sensitive habitat, receiving waters or a storm drain, or be subject to wave, wind, rain or tidal erosion and dispersion. **Language should be added to this condition that specifically prohibits storage of the above in Basin 4 parking lot at any time or on Appian Way or any public street nearby.**

Special Condition 8, The Final Low Impact Development Plan, states that:

(4) The parking lot(s) shall be swept with a vacuum regenerative sweeper a minimum of once weekly;
(5) Trash, recycling and other waste containers, as necessary, shall be provided. All waste containers anywhere within the development shall be covered, watertight, and designed to resist scavenging animals.

We recommended that no vacuum sweeping take place near or under nesting sites in the parking lot or on adjacent parkways during nesting season and that no waste containers be placed under roosting/nesting trees in Basin 4 parking lot.

Under **Special Condition 12, 12. Breeding and Nesting Bird Surveys During Construction**, bird surveys, monitoring, and accommodation for impacts, are limited to 500 ft. **We ask for this distance to be increased to 800 ft to include all nesting and roosting trees in the parking lot and adjacent parkways. We ask that no construction take place during nesting season. We ask that a proactive plan to insure proper protection for this coastal bird rookery be submitted by the City of Long Beach and agreed to be the Long Beach Yacht Club before this CDP can be approved. This should include educational signage, restriction of blowers and parking beneath nesting sites during nesting season, removal of dumpsters currently located beneath trees in Basin 4 parking lot, and restriction of tree trimming to every other year for all trees in this section of the marina, including parking lot, parkways, green spaces, and at the Yacht Club.**

EQUITY/ENVIRONMENTAL JUSTICE

Who will enjoy the benefits of this expanded facility, owned by the City of Long Beach and built on state tidelands? Only a select few. Currently the fee to join the Long Beach Yacht Club is \$12,500. Monthly dues are \$455 and members must spend \$240 on food and beverages at the club per quarter.

Commodores, past, present, and future, pay nothing. The average income of a Long Beach resident is \$40,293, putting club membership well out of reach. While it is the City, not the Coastal Commission who determines the amount of leases, fees for special events, and other fees, it is worth noting that the Long Beach Yacht Club pays only \$1620 per month under its current fifty year lease, well below market value. It is routinely excused from special event fees such as dock fees for regattas and other special events whose participants are also more likely to be affluent than not. Although the club's charitable works and donations are acknowledged, it is also true that Tidelands Funds and other public monies have not been equitably spent across this coastal zone. The results are that the majority of residents and low-income visitors to Long Beach continue to lack equal access to coastal resources while a wealthy, white, minority sees their continued coastal access ensured and expanding.

The Coastal Act's Environmental Justice Policy acknowledges the need to increase public participation in decision making regarding coastal access and coastal resources. The City's failure to conduct a full EIR for this project should not be echoed by the Coastal Commission's denial that legitimate CEQA concerns have yet to be addressed through public hearings.

We ask that this project be denied on Environmental Justice grounds.CEQA

J. California Environmental Quality Act (CEQA) Section 13096 of Title 14 of the California Code of Regulations requires Commission approval of Coastal Development Permit applications to be supported by findings showing the approval, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of **CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.**

In this case, the City of Long Beach is the lead agency, and the Commission is a responsible agency for the purposes of CEQA. **The City of Long Beach determined on September 9, 2024, that the proposed project is categorically exempt from CEQA pursuant to CEQA Guidelines Class 1 (Section 15301, Existing Structures) and Class 2 (Section 15302, Replacement or Reconstruction).** Due to this decision, the general public was denied the opportunity of a full review of the environmental impacts of the project under CEQA as well as the right to public hearings.

As a responsible agency under CEQA, the Commission has determined that the proposed project, as conditioned, is consistent with the development and land use, public access and recreation, hazards, biological resources and water quality policies of the Coastal Act. As conditioned, there are no feasible alternatives or feasible mitigation measures available that would substantially lessen any significant adverse impact that the activity may have on the environment. Therefore, the Commission finds that the proposed project can be found consistent with the requirements of the Coastal Act to conform to CEQA.

By determining that the project is categorically exempt from CEQA, there is no means to determine whether there is a more environmentally feasible alternative. We urge the

Commission deny this CDP until a full Environmental Impact Report is done.

LAW OFFICE OF JORDAN R. SISSON
LAND USE, ENVIRONMENTAL & MUNICIPAL LAW

3993 Orange Street, Suite 201
Riverside, CA 92501

Office: (951) 405-8127
Direct: (951) 542-2735

jordan@jrsissonlaw.com
www.jrsissonlaw.com

August 8, 2025

VIA EMAIL:

California Coastal Commission (executivestaff@coastal.ca.gov.)
c/o Executive Director, Kate Huckelbridge (kate.huckelbridge@coastal.ca.gov)

**RE: ITEM TH17e CAL. COASTAL COMMISSION HEARING SCHEDULED AUGUST 14, 2025;
LONG BEACH YACHT CLUB EXPANSION PROJECT (6201 APPIAN WAY, LONG BEACH)**

Dear Honorable Chair, Coastal Commissioners, and Coastal Commission Staff:

On behalf of UNITE HERE Local 11 and its members (collectively “Local 11”), this office respectfully provides the California Coastal Commission (“Commission” or “CCC”) with the following comments¹ regarding the proposed coastal development permit (“CDP”) to allow the Long Beach Yacht Club (“Yacht Club”) to renovate/remodel its existing 21,026 square foot (“sf”) clubhouse built in the 1960s (“1960 Clubhouse”) and allow a 20,179-sf addition as part of a new pool building (“Pool Building”) that results in a total 41,205-sf Yacht Club (collectively “Project”). Local 11 represents members who work at the Yacht Club, as well as other members who live in inland communities that are impacted when coastal communities lack meaningful lower cost public recreational opportunities, which is relevant under the Coastal Act. (See Pub. Res. Code § 30213.)

The above-referenced “Property” is located on tidelands leased from the City of Long Beach (“City”), which seemingly approved the Project for two Conditional Use Permits (“CUP(s)”) in July 2024, including CUP No. CUP22-027 (i.e., for the operation of a private club) and a CUP No. CUP22-028 (i.e., for the onsite service of alcoholic beverages).² The CUPs are necessary because the private Yacht Club was established pre-Coastal Act, which carries limited nonconforming rights and does not cover post-Coastal Act development (seemingly done without a CDP).

The proposed CDP would also authorize after-the-fact approval to seemingly resolve unpermitted development, a process currently pursued by the CCC enforcement division, including unpermitted structures built around existing pool areas (i.e., where the Pool Building addition is proposed).³ According to the above-referenced staff report (“CCC SR”), CCC staff is recommending approval of the CDP with 21 special conditions. (See CCC SR, pp. 1-3.)

¹ Herein, page citations are either the stated pagination (i.e., “p. #”) or PDF-page location (i.e., “PDF p. #”).

² Long Beach Planning Commission Staff Report (7/18/24) (presumably granting the CUPs) (“PC SR”), <https://longbeach.primegov.com/api/compilemeetingattachmenthistory/historyattachment/?historyId=03bcd08a-4085-4690-b611-eaf18564f908>; Id., attachments (all available on City’s websites), <https://longbeach.primegov.com/Portal/Meeting?meetingTemplateId=28822>.

³ See e.g., PC SR, ATT-B (Site Photographs), p. 3; see also PC SR, ATT-C (Project Plans), PDF p. 25 (sheet A24).

In short, Local 11 respectfully disagrees with the CCC staff recommendation, in large part due to the lack of lower-cost public recreational opportunities under the existing conditions of the Yacht Club, much less under the proposed Project that would double the size of the Yacht Club and constitute a significant intensification of the Property, which is public land. This seems inconsistent with the applicable Chapter 3 policies under the Coastal Act (“Coastal Act”) and the City’s Local Coastal Program (“LCP”),⁴ including but not limited to Coastal Act § 30213. We will send supplemental information and testimony about the following points:

- The Commission should defer action on the CDP to address the existing enforcement matter related to unpermitted development (consistent with prior CCC precedent).
- Substantial evidence is provided showing how the existing large events hosted by the Yacht Club already adversely impact the adjacent public parking lot (i.e., as evidenced by the October 2021 events).⁵ These impacts are likely to be exacerbated by the doubling in size of the Yacht Club, which is an intensification of the existing use, and not adequately addressed in the applicant’s flawed parking study and inadequate traffic demand management (“TDM”) program. (Id.) This directly impacts public access.
- Notwithstanding its purported charitable endeavors, the Yacht Club’s nonconforming rights do not authorize the intensification of these prior uses, much less excuse seemingly unpermitted structures around the existing pool, and the Yacht Club seeks approval for this intensification. (CCC SR, pp. 24, 26; PC SR, pp. 2, 3, 8.) However, the Yacht Club—which sits on public land held in trust by the City—offers no meaningful public recreational opportunities/facilities for the public under the existing leasehold (i.e., past 65 years), nor provides any in this intensification Project under the future leasehold (i.e., future 65+ years). (CCC SR, pp. 2, 24, 26-27; PC SR, pp. 2, 3, 8.) This seems to be in direct conflict with Coastal Act § 30213, which intends to protect, encourage, and, where feasible, provide lower-cost recreational facilities. (Pub. Res. Code § 30213.) This would seem even more critical when it is on public land. (Id.)

For these reasons, the Project and the requested CDP seem to be inconsistent with various Chapter 3 Coastal Act policies. Therefore, Local 11 respectfully requests that the Coastal Commission delay action on the CDP and direct CCC staff to work with the applicant to revise the CDP application to address the issues discussed herein, including but not limited to:

- The adequacy of the proposed TDM program, including whether addition TDM measures and other sustainability conditions are warranted, such as those measures attached hereto proffered by public agencies like the California Air Pollution Control Officers Association (“CAPCOA”), the Southern California Association of Governments (“SCAG”), and the California Air Resources Board (“CARB”). (See Exhibit A, Figs. 1 through 3 [respectively].)

/ / /

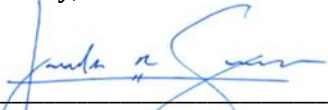
⁴ See Inclusive of the City’s Local Implementation Plan (“LIP”) under the Long Beach Municipal Code (“LBMC” or “Code”) and Local Coastal Program (“LCP”). (See <https://www.longbeach.gov/globalassets/lbcd/media-library/documents/planning/advance/general-plan/local-coastal-program-with-seasp-and-pd-2.>)

⁵ See Yacht Club, [Calendar \(October 2021\)](#) (accessed 8/6/25); see also Google Earth Images ([October 17, 2021](#)) and ([October 16, 2021](#)).

- In light of Coastal Act § 30213, the adequacy of the lower-cost recreational facilities at the Yacht Club, which is located on public land leased from the City over the seemingly past 65 years, and likely future 65+ years.
- Measures to minimize potential impacts on scenic resources.
- And other measures deemed appropriate by the Coastal Commission, involving this matter.

Thank you for considering these comments, which we intended to supplement further.

Sincerely,



Jordan R. Sisson
Attorney for UNITE HERE Local 11

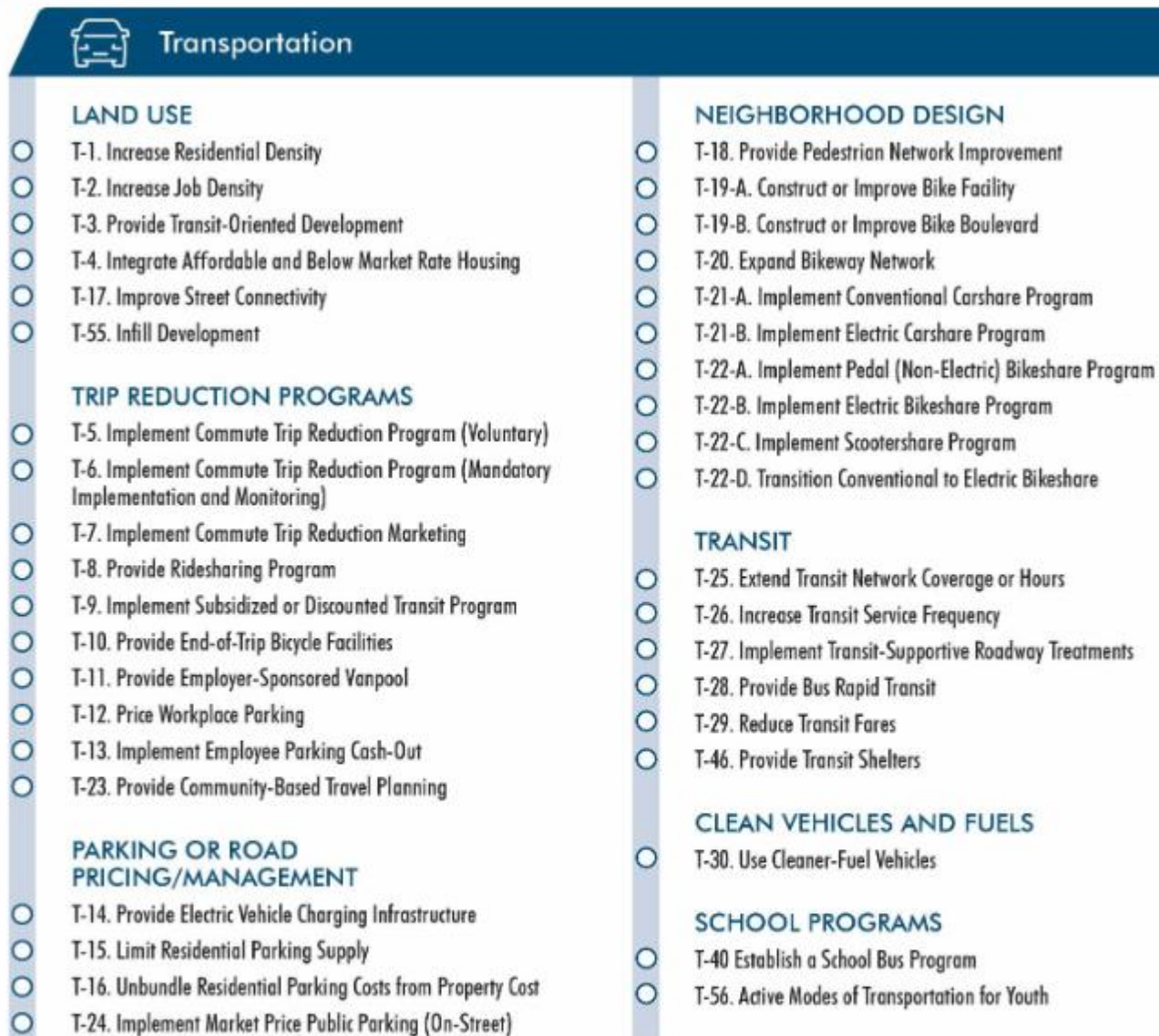
ATTACHMENTS:

Exhibit A: CAPCOA, SCAG, CARB Measures⁶

⁶ <https://www.dropbox.com/scl/fi/vrmtjkmfgb9osplon8v42/MM-Measures.pdf?rlkey=ad4r5u8jdahfjku0p8nup8w36&dl=0>.

EXHIBIT A

Figure 3-1. Navigation Trees for Quantitative GHG Reduction Measures



¹ CAPCOA (Dec. 2021) Handbook for Analyzing GHG Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, pp. 31-32, 47-51 (listing measures https://www.caleemod.com/documents/handbook/full_handbook.pdf; id., pp. 52-60, 84-417 (further describing each measure).

Figure 1 (Cont.)

 Energy	 Water	 Lawn and Landscaping	 Solid Waste
<p>ENERGY EFFICIENCY IMPROVEMENTS</p> <ul style="list-style-type: none"> ○ E-1. Buildings Exceed 2019 Title 24 Building Envelope Energy Efficiency Standards ○ E-2. Require Energy Efficient Appliances ○ E-3-A. Require Energy Efficient Residential Boilers ○ E-3-B. Require Energy Efficient Commercial Packaged Boilers ○ E-4. Install Cool Roofs and/or Cool Walls in Residential Development ○ E-5. Install Green Roofs in Place of Dark Roofs ○ E-6. Encourage Residential Participation in Existing Demand Response Program(s) ○ E-7. Require Higher Efficacy Public Street and Area Lighting ○ E-8. Replace Incandescent Traffic Lights with LED Traffic Lights ○ E-9. Utilize a Combined Heat and Power System ○ E-21. Install Cool Pavement <p>RENEWABLE ENERGY GENERATION</p> <ul style="list-style-type: none"> ○ E-10-A. Establish Onsite Renewable Energy Systems—Generic ○ E-10-B. Establish Onsite Renewable Energy Systems—Solar Power ○ E-10-C. Establish Onsite Renewable Energy Systems—Wind Power ○ E-11. Procure Electricity from Lower Carbon Intensity Power Supply ○ E-26. Biomass Energy <p>BUILDING DECARBONIZATION</p> <ul style="list-style-type: none"> ○ E-12. Install Alternative Type of Water Heater in Place of Gas Storage Tank Heater in Residences ○ E-13. Install Electric Ranges in Place of Gas Ranges ○ E-14. Limit Wood Burning Devices and Natural Gas/Propane Fireplaces in Residential Development ○ E-15. Require All-Electric Development ○ E-16. Require Zero Net Energy Buildings ○ E-17. Require Renewable-Surplus Buildings <p>METHANE RECOVERY</p> <ul style="list-style-type: none"> ○ E-18. Establish Methane Recovery in Landfills ○ E-19. Establish Methane Recovery in Wastewater Treatment Plants 	<ul style="list-style-type: none"> ○ W-1. Use Reclaimed Non-Potable Water ○ W-2. Use Grey Water ○ W-3. Use Locally Sourced Water Supply ○ W-4. Require Low-Flow Water Fixtures ○ W-5. Design Water-Efficient Landscapes ○ W-6. Reduce Turf in Landscapes and Lawns ○ W-7. Adopt a Water Conservation Strategy <p>Natural and Working Lands</p> <ul style="list-style-type: none"> ○ N-1. Create New Vegetated Open Space ○ N-2. Expand Urban Tree Planting ○ N-3. Implement Management Practices to Improve the Health and Function of Natural and Working Lands ○ N-4. Require Best Management Practices for Manure Management ○ N-7. Wildfire Resilience and Management ○ N-8. Agricultural Equipment Efficiency <p>Refrigerants</p> <ul style="list-style-type: none"> ○ R-1. Use Alternative Refrigerants Instead of High-GWP Refrigerants ○ R-2. Install Secondary Loop and/or Cascade Supermarket Systems in Place of Direct Expansion Systems ○ R-3. Install Transcritical CO₂ Supermarket Systems in Place of High-GWP Systems ○ R-4. Install Microchannel Heat Exchangers in A/C Equipment in Place of Conventional Heat Exchanger ○ R-5. Reduce Service Leak Emissions ○ R-6. Reduce Operational Leak Emissions ○ R-7. Reduce Disposal Emissions 	<ul style="list-style-type: none"> ○ LL-1. Replace Gas Powered Landscape Equipment with Zero-Emission Landscape Equipment <p>Construction</p> <ul style="list-style-type: none"> ○ C-1-A. Use Electric or Hybrid Powered Equipment ○ C-1-B. Use Cleaner-Fuel Equipment ○ C-2. Limit Heavy-Duty Diesel Vehicle Idling ○ C-3. Use Local Construction Contractors <p>Miscellaneous</p> <ul style="list-style-type: none"> ○ M-1. Establish a Carbon Sequestration Project ○ M-2. Establish Offsite Mitigation ○ M-3. Implement an Innovative Strategy for GHG Mitigation ○ M-6. Off-Road Equipment Efficiency 	<ul style="list-style-type: none"> ○ S-1. Institute or Extend Recycling Services ○ S-2. Implement Organics Diversion Program ○ S-3. Require Edible Food Recovery Program Partnerships with Food Generators

Figure 1 (Cont.)

Table 3-1. Summary of Supporting or Non-Quantified GHG Reduction Measures and Descriptors

#	Measure Title	Scale of Application	Locational Context	Co-Benefits									
				Improved Air Quality	Energy and Fuel Savings	VMT Reductions	Water Conservation	Enhanced Pedestrian or Traffic Safety	Improved Public Health	Improved Ecosystem Health	Enhanced Energy Security	Enhanced Food Security	Social Equity
Transportation (Land Use)													
T-31-A	Locate Project in Area with High Destination Accessibility	P/S	U, S	●	●	●	○	●	●	○	○	○	⊕
T-31-B	Improve Destination Accessibility in Underserved Areas	P/C	U, S	●	●	●	○	●	●	○	○	○	●
T-32	Orient Project Toward Transit, Bicycle, or Pedestrian Facility	P/S	U, S, R ^a , R ^b , R ^c	●	●	●	○	●	●	○	○	○	⊕
T-33	Locate Project near Bike Path/Bike Lane	P/S	U, S	●	●	●	○	●	●	○	○	○	⊕
Transportation (Neighborhood Design)													
T-34	Provide Bike Parking	All	All	●	●	●	○	●	●	○	○	○	⊕
T-35	Provide Traffic Calming Measures	P/C	All	●	●	●	○	●	●	○	○	○	⊕
T-36	Create Urban Non-Motorized Zones	P/C	U	●	●	●	○	●	●	○	○	○	⊕
T-37	Dedicate Land for Bike Trails	P/C	All	●	●	●	○	●	●	○	○	○	⊕
Transportation (Trip Reduction Programs)													
T-38	Provide First and Last Mile TNC Incentives	P/C	U, S, R ^b	●	●	●	○	●	●	○	○	○	⊕
T-39	Implement Preferential Parking Permit Program	P/S	U, S	●	●	●	○	●	●	○	○	○	○

Figure 1 (Cont.)

#	Measure Title	Scale of Application	Locational Context	Co-Benefits									
				Improved Air Quality	Energy and Fuel Savings	VMT Reductions	Water Conservation	Enhanced Pedestrian or Traffic Safety	Improved Public Health	Improved Ecosystem Health	Enhanced Energy Security	Enhanced Food Security	Social Equity
T-41	Implement a School Pool Program	P/S	All	●	●	●	○	●	●	○	○	○	⊙
T-42	Implement Telecommute and/or Alternative Work Schedule Program	P/S	All	⊙	⊙	⊙	○	⊙	⊙	○	○	○	⊙
Transportation (Transit)													
T-43	Provide Real-Time Transit Information	P/C	All	●	●	●	○	●	●	○	○	○	⊙
T-44	Provide Shuttles (Gas or Electric)	P/S	U, S	●	●	●	○	●	●	○	○	○	⊙
T-45	Provide On-Demand Microtransit	All	U, S	●	●	●	○	●	●	○	○	○	⊙
T-47	Provide Bike Parking Near Transit	P/C	U, S	●	●	●	○	●	●	○	○	○	⊙
Transportation (Parking or Road Pricing/Management)													
T-48	Implement Area or Cordon Pricing	P/C	U	●	●	●	○	●	●	○	○	○	○
T-49	Replace Traffic Controls with Roundabout	P/C	All	●	●	●	○	●	●	○	○	○	○
T-50	Required Project Contributions to Transportation Infrastructure Improvement	P/C	All	●	●	●	○	●	●	○	○	○	○
T-51	Install Park-and-Ride Lots	P/C	S, R	●	●	●	○	●	●	○	○	○	⊙
T-52	Designate Zero Emissions Delivery Zones	P/C	U	●	●	●	○	●	●	○	○	○	⊙

Figure 1 (Cont.)

#	Measure Title	Scale of Application	Locational Context	Co-Benefits									
				Improved Air Quality	Energy and Fuel Savings	VMT Reductions	Water Conservation	Enhanced Pedestrian or Traffic Safety	Improved Public Health	Improved Ecosystem Health	Enhanced Energy Security	Enhanced Food Security	Social Equity
Transportation (Clean Vehicles and Fuels)													
T-53	Electrify Loading Docks	P/S	All	●	●	●	○	○	○	○	●	○	⊕
T-54	Install Hydrogen Fueling Infrastructure	All	—	●	●	○	○	○	●	○	●	○	○
Energy (Energy Efficiency Improvements)													
E-20	Install Whole-House Fans	P/S	—	○	●	○	○	○	○	○	●	○	⊕
E-22	Obtain Third-party HVAC Commissioning and Verification of Energy Savings	P/S	—	○	●	○	○	○	○	○	●	○	⊕
Energy (Renewable Energy Generation)													
E-23	Use Microgrids and Energy Storage	All	—	⊕	●	○	○	○	●	○	●	○	⊕
E-24	Provide Battery Storage	All	—	⊕	●	○	○	○	●	○	●	○	⊕
Energy (Building Decarbonization)													
E-25	Install Electric Heat Pumps	All	—	●	●	○	○	○	●	○	⊕	○	⊕
Lawn and Landscaping													
LL-2	Implement Yard Equipment Exchange Program	P/S	—	●	●	○	○	○	●	●	●	○	⊕
LL-3	Electric Yard Equipment Compatibility	P/S	—	○	○	○	○	○	●	○	○	○	○

Figure 1 (Cont.)

#	Measure Title	Scale of Application	Locational Context	Co-Benefits									
				Improved Air Quality	Energy and Fuel Savings	VMT Reductions	Water Conservation	Enhanced Pedestrian or Traffic Safety	Improved Public Health	Improved Ecosystem Health	Enhanced Energy Security	Enhanced Food Security	Social Equity
Solid Waste													
S-4	Recycle Demolished Construction Material	P/S	—	○	●	○	○	○	○	⊕	○	○	○
S-5	Source Wood Materials from Urban Wood Re-Use Program	All	—	○	●	●	●	○	○	●	○	○	○
Natural and Working Lands													
N-5	Establish a Local Farmer's Market	P/C	—	●	●	●	○	●	●	○	○	●	⊕
N-6	Establish Community Gardens	P/C	—	●	○	⊕	○	○	●	●	○	●	⊕
Construction													
C-4	Use Local and Sustainable Building Materials	All	—	○	●	●	○	○	○	⊕	○	○	○
Miscellaneous													
M-4	Require Environmentally Responsible Purchasing	P/S	—	⊕	⊕	○	⊕	○	○	⊕	○	○	○
M-5	Fund Incentives for Green Technologies	P/C	—	⊕	⊕	⊕	⊕	⊕	⊕	⊕	⊕	⊕	⊕

Sector abbreviations: T = transportation; E = energy; W = water; LL = lawn and landscaping; S = solid waste; N = natural and working lands; C = construction; M = miscellaneous.

Scale of application column abbreviations: P/S = Project/Site; P/C = Plan/Community; All.

Figure 1 (Cont.)

Figure 1 (Cont.)

Figure 1 (Cont.)

Figure 2: 2024 RTP/SCS Project Level Mitigation Measures ²

TABLE A-1 Mitigation Monitoring and Reporting Program Matrix

MITIGATION MEASURE		MITIGATION MONITORING TIMING	RESPONSIBLE MONITORING ENTITY
###			
Air Quality			
SMM AQ-1:	SCAG shall continue to support and provide information on regional air quality planning and related issue areas in the region. SCAG staff shall also continue to work with the U.S. Environmental Protection Agency, California Air Resources Board, and the air districts within the SCAG region and provide updates to relevant stakeholders on regional air quality planning and related issue areas through regional collaboration forums such as SCAG's Transportation Conformity Working Group.	Ongoing over the life of the plan	SCAG
PMM AQ-1:	In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce significant adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the lead agency: a) Minimize land disturbance. b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. c) Cover trucks when hauling dirt. d) Stabilize the surface of dirt piles if not removed immediately. e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. f) Minimize unnecessary vehicular and machinery activities. g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.	Ongoing over the life of the plan	Lead Agency
###			
MITIGATION MEASURE		MITIGATION MONITORING TIMING	RESPONSIBLE MONITORING ENTITY
j) Assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower [hp] and greater) that could be used on an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. k) Ensure that all construction equipment is properly tuned and maintained. l) Minimize idling time to 5 minutes—saves fuel and reduces emissions. m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators. o) Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. p) Obtain CARB Portable Equipment Registration with the state or a local district permit for portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles. Arrange appropriate consultations with CARB or the local air district to determine registration and permitting requirements prior to equipment operation at the site. q) Use Tier 4 Final equipment or better for all engines above 50 hp. In the event that construction equipment cannot meet to Tier 4 Final or better engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the project's lead agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 Final or better engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible or higher tier standard diesel equipment as it becomes developed and feasible. r) Projects located within the South Coast Air Basin and the Coachella Valley should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for identification of additional feasible mitigation that can be applied to individual projects.			

² SCAG (Apr. 2024) MMRP for the 2024 RTP/SCS Program EIR, pp. A-3, A-7 – A-13 (air quality), A-26 – A-30 (GHG), A-42 – A-43 (Transportation), A-44 – A-46 (utilities service systems), https://scag.ca.gov/sites/default/files/2024-05/exhibit_a_mmrp_508_final.pdf.

Figure 2 (continued)

MITIGATION MEASURE	MITIGATION MONITORING TIMING	RESPONSIBLE MONITORING ENTITY
<p>t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.</p> <p>u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).</p> <p>v) As applicable for airport projects, the following measures should be considered:</p> <ul style="list-style-type: none"> – Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxiing, if feasible as allowed per Federal Aviation Administration guidelines. – Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. – Use ground service equipment (GSE) that can operate on battery-power. If using electric equipment is not feasible, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4 Final, at a minimum. <p>w) As applicable for port projects, the following measures should be considered:</p> <ul style="list-style-type: none"> – Develop specific timelines for transitioning to zero-emissions cargo handling equipment (CHE). – Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. – Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. – Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. – Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin. – Encourage the participation in the Green Ship Incentives. – Offer incentives to encourage the use of on-dock rail. <p>x) As applicable for rail projects, the following measures should be considered:</p> <ul style="list-style-type: none"> – Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards. <p>y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high-efficiency or enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.</p> <p>z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.</p>		

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MITIGATION MEASURE	MITIGATION MONITORING TIMING	RESPONSIBLE MONITORING ENTITY
<ul style="list-style-type: none"> – Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside. – Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued. – Disclose the potential increase in energy costs for running the HVAC system to prospective residents. – Provide information to residents on where MERV filters can be purchased. – Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units. – Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time. – Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units. – Set criteria for assessing progress in installing and replacing the enhanced filtration units; and – Develop a process for evaluating the effectiveness of the enhanced filtration units. <p>aa) Consult the SCAG Equity Resources for Action (ERA) Toolbox available on the SCAG's Environmental Justice webpage for potential measures to address impacts to low-income and/or communities of color.</p> <p>bb) The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible:</p> <ul style="list-style-type: none"> – Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. – Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. – Nonroad diesel engines on site shall be Tier 2 or higher. – Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp. – The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following: <ul style="list-style-type: none"> i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment. ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. 		

Figure 2 (continued)

MITIGATION MEASURE	MITIGATION MONITORING TIMING	RESPONSIBLE MONITORING ENTITY
<ul style="list-style-type: none"> iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date. – Establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities. – Maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes: <ul style="list-style-type: none"> i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date. ii. Any problems with the equipment or emission controls. iii. Certified copies of fuel deliveries for the time period that identify: <ul style="list-style-type: none"> 1. Source of supply 2. Quantity of fuel 3. Quantity of fuel, including sulfur content (percent by weight) cc) Promote energy efficiency and exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code): <ul style="list-style-type: none"> – Install programmable thermostat timers – Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24). – Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.) – Install higher efficacy public street and area lighting – Limit outdoor lighting requirements – Replace traffic lights with LED traffic lights – Establish onsite renewable or carbon neutral energy systems – generic, solar power and wind power – Utilize a combined heat and power system dd) Promote transportation efficiency. The following measures can be used to increase transportation efficiency: <ul style="list-style-type: none"> – Locate project near bike path/bike lane – Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers. – Provide traffic calming measures, such as: <ul style="list-style-type: none"> i. Marked crosswalks 		

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MITIGATION MEASURE	MITIGATION MONITORING TIMING	RESPONSIBLE MONITORING ENTITY
<ul style="list-style-type: none"> ii. Count-down signal timers iii. Curb extensions iv. Speed tables v. Raised crosswalks vi. Raised intersections vii. Median islands viii. Tight corner radii ix. Roundabouts or mini-circles x. On-street parking xi. Chicanes/chokers – Create urban non-motorized zones – Provide bike parking in non-residential and multi-unit residential projects – Dedicate land for bike trails – Limit parking supply through: <ul style="list-style-type: none"> i. Elimination (or reduction) of minimum parking requirements ii. Creation of maximum parking requirements iii. Provision of shared parking – Require residential area parking permit. – Provide ride-sharing programs <ul style="list-style-type: none"> i. Designate a certain percentage of parking spacing for ride sharing vehicles ii. Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles iii. Providing a web site or messaging board for coordinating rides iv. Permanent transportation management association membership and finding requirement. ee) Lengthen the construction period during smog season (May through October) by extending the construction hours per workday or number of days worked per week, to minimize the number of vehicles and equipment operating at the same time. ff) Install signage containing the complaint number of the local air district where construction activities are located at the construction sites. 		

Figure 2 (continued)

MITIGATION MEASURE	MITIGATION MONITORING TIMING	RESPONSIBLE MONITORING ENTITY
<p>PMM GHG-1: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions. Such measures may include the following or other comparable measures identified by the lead agency:</p> <ul style="list-style-type: none"> a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including: <ul style="list-style-type: none"> i) Use energy efficient materials in building design, construction, rehabilitation, and retrofit. ii) Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. iii) Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight. iv) Incorporate passive environmental control systems that account for the characteristics of the natural environment. v) Use high-efficiency lighting and cooking devices. vi) Incorporate passive solar design. vii) Use high-reflectivity building materials and multiple glazing. viii) Use no gas-powered landscape maintenance equipment. ix) Install alternative fuel (i.e., electric, hydrogen-fueled, etc.) vehicle charging and fueling stations. x) Reduce wood burning stoves or fireplaces. xi) Provide bike lanes accessibility and parking at residential developments. xii) Encourage projects to reduce natural gas infrastructure in buildings and/or reduce the use of natural gas appliances, with exceptions for limited uses. b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. c) Include off-site measures to mitigate a project's emissions. d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction, and operation of projects to minimize GHG emissions, including but not limited to: <ul style="list-style-type: none"> i) Use energy and fuel-efficient vehicles and equipment; ii) Deployment of zero- and/or near zero emission technologies; iii) Use lighting systems that are energy efficient, such as LED technology; iv) Use the minimum feasible amount of GHG-emitting construction materials; v) Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production; 	Ongoing over the life of the plan	Lead Agency

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MITIGATION MEASURE	MITIGATION MONITORING TIMING	RESPONSIBLE MONITORING ENTITY
<ul style="list-style-type: none"> vi) Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; vii) Incorporate design measures to reduce energy consumption and increase use of renewable energy; viii) Incorporate design measures to reduce water consumption; ix) Use lighter-colored pavement where feasible; x) Recycle construction debris to maximum extent feasible; xi) Plant shade trees in or near construction projects where feasible; and xii) Solicit bids that include concepts listed above. e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following: <ul style="list-style-type: none"> i) Promote transit-active transportation coordinated strategies; ii) Increase bicycle carrying capacity on transit and rail vehicles; iii) Improve or increase access to transit; iv) Increase access to common goods and services, such as groceries, schools, day care, and medical care; v) Incorporate housing, including affordable housing, into the project; vi) Incorporate a neighborhood electric vehicle network; vii) Orient the project toward transit, bicycle, and pedestrian facilities; viii) Improve pedestrian or bicycle networks, or transit service; ix) Provide traffic calming measures; x) Provide bicycle parking; xi) Limit or eliminate park supply; xii) Unbundle parking costs; xiii) Provide parking cash-out programs; xiv) Implement or provide access to commute reduction program; f) Incorporate bicycle and pedestrian facilities into project designs, maintain these facilities, and provide amenities incentivizing their use; and plan for and construct local bicycle projects that connect with the regional network; g) Improve transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; h) Adopt employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, provide end-of-trip facilities, and telecommuting programs including but not limited to measures that: <ul style="list-style-type: none"> i) Provide car-sharing, bike sharing, and ride-sharing programs; ii) Provide transit passes; 		

Figure 2 (continued)

MITIGATION MEASURE	MITIGATION MONITORING TIMING	RESPONSIBLE MONITORING ENTITY
<ul style="list-style-type: none"> iii) Shift single occupancy vehicle trips to carpooling or vanpooling, for example by providing ride-matching services; iv) Provide incentives or subsidies that increase use of modes other than single-occupancy vehicle; v) Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms; vi) Provide employee transportation coordinators at employment sites; vii) Provide a guaranteed ride home service to users of non-auto modes. l) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles; j) Land use siting and design measures that reduce GHG emissions, including: <ul style="list-style-type: none"> i) Developing on infill and brownfields sites; ii) Building compact and mixed-use developments near transit; iii) Retaining on-site mature trees and vegetation, and planting new canopy trees; iv) Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of alternative fuel (e.g., electric, hydrogen-fueled, etc.) vehicle charging and fueling stations or neighborhood alternative fuel vehicle networks, or charging for electric bicycles; v) Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; and vi) Establish methane recovery in Landfills and Wastewater Treatment Plants, where applicable. k) Consult the SCAG Equity Resources for Action (ERA) Toolbox available on SCAG's Environmental Justice webpage for potential measures to address impacts to low-income and/or communities of color. l) Require at least five percent of all new vehicle parking spaces include alternative fuel (e.g., electric, hydrogen-fueled, etc.) vehicle charging and fueling stations, or at a minimum, install the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in. Encourage electric vehicle capable (branch circuit and raceway) or ready (charging outlet) spaces to accommodate future growth in electric vehicles. m) Encourage telecommuting and alternative work schedules, such as: <ul style="list-style-type: none"> i) Staggered starting times ii) Flexible schedules iii) Compressed work weeks n) Implement commute trip reduction marketing, such as: <ul style="list-style-type: none"> i) New employee orientation of trip reduction and alternative mode options ii) Event promotions iii) Publications 		
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MITIGATION MEASURE	MITIGATION MONITORING TIMING	RESPONSIBLE MONITORING ENTITY
<ul style="list-style-type: none"> o) Implement preferential parking permit program p) Implement school pool and bus programs q) Price workplace parking, such as: <ul style="list-style-type: none"> i) Explicitly charging for parking for its employees ii) Implementing above market rate pricing iii) Validating parking only for invited guests iv) Not providing employee parking and transportation allowances v) Educating employees about available alternatives. 		

Figure 2 (continued)

MITIGATION MEASURE	MITIGATION MONITORING TIMING	RESPONSIBLE MONITORING ENTITY
iii. Promoting water-efficient land use and development iv. Encouraging multiple uses, such as the joint use of schools v. Including trail systems and trail segments in General Plan recreation standards.		
Transportation		
SMM TRA-1: SCAG shall facilitate the reduction of vehicle miles traveled (VMT) and impacts to circulation and access through mobility improvements and by encouraging transit/rail and active transportation use via stakeholder forums (e.g., quarterly Safe and Active Streets Working Group meetings, bimonthly Regional Transit Technical Advisory Committee meetings, monthly Active Transportation Program check-ins with County Transportation Commissions). These objectives will also be facilitated through the hosting of regional forums for policy makers, County Transportation Commissions, planning agencies, local jurisdictions, and state partners to promote information sharing.	Ongoing over the life of the plan	SCAG
SMM TRA-2: SCAG shall continue to support development of local and regional SB 743 implementation programs.	Ongoing over the life of the plan	SCAG
SMM TRA-3: SCAG shall continue to develop and support its program for reducing average daily number of SCAG employees' commute vehicle trips.	Ongoing over the life of the plan	SCAG
PMM TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts. Such measures may include the following or other comparable measures identified by the lead agency: For future land use development projects, lead agencies to encourage the incorporation of transit, bicycle, pedestrian, and micro-mobility facilities, features, and services in project designs, as well as encourage developers to provide information regarding the availability of these facilities and services to residents, tenants, and owners in order to facilitate increased access to and utilization of transit and active transportation services and facilities.	Ongoing over the life of the plan	Lead Agency
PMM TRA-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts. Such measures may include the following or other comparable measures identified by the lead agency: <ul style="list-style-type: none"> Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local jurisdictions should incorporate strategies identified in the Federal Highway Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways: <ul style="list-style-type: none"> Include TDM mitigation requirements for new developments; 	Ongoing over the life of the plan	Lead Agency
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MITIGATION MEASURE	MITIGATION MONITORING TIMING	RESPONSIBLE MONITORING ENTITY
<ul style="list-style-type: none"> Incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks; Provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing; Implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools; Develop TDM-specific performance measures to evaluate project-specific and system-wide performance; Incorporate TDM performance measures in the decision-making process for identifying transportation investments; Implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and Set aside funding for TDM initiatives 		
PMM TRA-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts. Such measures may include the following or other comparable measures identified by the lead agency: Prepare a sight distance analysis as needed for locations where sight lines could be impeded. The sight distance analysis to be prepared according to the jurisdiction's applicable Municipal Code requirements and the Caltrans Highway Design Manual (HCM) standards and guidelines, and should recommend safety improvements as appropriate such as limited use areas (e.g., low-height landscaping), on-street parking restrictions (e.g., red curb), and any turning restrictions (e.g., right-in/right-out).	Ongoing over the life of the plan	Lead Agency

Figure 2 (continued)

MITIGATION MEASURE	MITIGATION MONITORING TIMING	RESPONSIBLE MONITORING ENTITY
<ul style="list-style-type: none"> c) Provide permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource. d) If tribal cultural resources are found, then the lead agency should consider tribal construction monitoring. 		
Utilities and Service Systems		
SMM USSW-1: SCAG shall continue to provide support for coordinating with waste management agencies, and appropriate local and regional jurisdictions, and sharing information to facilitate and encourage diversion of solid waste where applicable, appropriate, and feasible.	Ongoing over the life of the plan	SCAG
PMM UTIL-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency. <ul style="list-style-type: none"> • During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. The proposed development can and should be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities. 	Ongoing over the life of the plan	Lead Agency
PMM UTIL-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency: <ul style="list-style-type: none"> a) Reduce exterior consumptive uses of water in public areas, and promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. b) Promote the availability of drought-resistant landscaping options and provide information on how these can be obtained. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite. 	Ongoing over the life of the plan	Lead Agency

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MITIGATION MEASURE	MITIGATION MONITORING TIMING	RESPONSIBLE MONITORING ENTITY
PMM UTIL-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency: <p>Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following:</p> <ul style="list-style-type: none"> a) Reuse and minimize construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. b) Include a waste management plan that promotes maximum C&D diversion. c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). d) Reuse existing structure and shell in renovation projects. e) Develop indoor recycling program and space. f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities. g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and where appropriate and feasible. h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent state waste diversion target. i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction, and recycling practices. j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing additional opportunities to divert food waste away from landfills and toward food banks and composting facilities. k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. l) Integrate reuse and recycling into residential industrial, institutional, and commercial projects. m) Provide education and publicity about reducing waste and available recycling services. 	Ongoing over the life of the plan	Lead Agency

Figure 2 (continued)

MITIGATION MEASURE	MITIGATION MONITORING TIMING	RESPONSIBLE MONITORING ENTITY
n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.		

Figure 3: CARB's 2022 Scoping Plan, Local Action Appendix (Priority Strategies) ³

Priority Areas	Priority GHG Reduction Strategies
Transportation Electrification	Convert local government fleets to ZEVs and provide EV charging at public sites
	Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans)
VMT Reduction	Reduce or eliminate minimum parking standards ²³
	Implement Complete Streets policies and investments, consistent with general plan circulation element requirements ^{24,25}
	Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.
	Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking
	Implement parking pricing or transportation demand management pricing strategies

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Priority Areas	Priority GHG Reduction Strategies
	Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood) ²⁶
	Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements)
Building Decarbonization	Adopt all-electric new construction reach codes for residential and commercial uses ²⁷
	Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers)
	Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances
	Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing)
	Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings)

³ CARB 2022 Scoping Plan, Appendix D (Local Action), pp. 11-12, 22-23, <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-d-local-actions.pdf>.

Figure 3 (continued)

Table 3 – Key Residential and Mixed-Use Project Attributes that Reduce GHGs

Priority Areas	Key Project Attribute
Transportation Electrification	Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval ⁴⁸
VMT Reduction	Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer) ⁴⁹
	Does not result in the loss or conversion of natural and working lands
	Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), ⁵⁰ <u>or</u> Is in proximity to existing transit stops (within a half mile), ⁵¹ <u>or</u> Satisfies more detailed and stringent criteria specified in the region's SCS ⁵²
	Reduces parking requirements ⁵³ by: Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or

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Priority Areas	Key Project Attribute
	For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit. ⁵⁴
	At least 20 percent of units included are affordable to lower-income residents ^{55, 56}
	Results in no net loss of existing affordable units
Building Decarbonization	Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking ^{57, 58}

Energy

- Streamline permitting and environmental review and reduce fees for small-scale renewable energy systems
 - Adopt a community solar program to help realize economies of scale and help residents without appropriate rooftop space to participate in clean energy generation
- ####
- Promote property-assessed clean energy financing districts or other financing mechanisms to fund permanent energy-efficiency, water-efficiency, and renewable energy improvements in the residential and commercial sectors
 - Incentivize energy-efficiency upgrades for existing buildings at the time of a major remodel or change of ownership
 - Reduce permit fees and streamline permitting requirements for energy-efficiency- and renewable energy-related building renovations
 - Implement building energy audit and retrofit programs and residential solar programs
 - Adopt residential and commercial energy conservation, renewable energy, and/or zero net energy ordinances (consider requirements for audits or upgrades at major renovation or time of sale)
 - Incorporate renewable energy and energy efficiency into public facilities' capital improvements
 - Replace public lighting with energy-efficient lighting
 - Permit renewable energy generation facilities as of right in zones with compatible uses
 - Create incentive programs to promote the building energy-efficiency projects
 - Implement large-scale energy storage in commercial and industrial buildings to control peak loads
 - Require new residential and commercial construction to install solar or be solar ready (see California Energy Code)
 - Encourage the development of brightfields – brownfields that are used to develop solar energy – through tax incentives, streamlining, and use of locally-owned land
 - Pursue renewable energy development on municipal buildings or purchase renewable energy to power municipal operations
 - Require on-site renewable energy generation by large-scale residential and commercial projects
 - Incentivize energy-efficiency upgrades to existing buildings, where appropriate, upon issuing a permit for substantial modification

⁴ CARB 2017 Scoping Plan, Appendix B (Local Action), pp. 1-10,
https://ww3.arb.ca.gov/cc/scopingplan/2030sp_appb_localaction_final.pdf.

Natural and Working Lands (NWL)

Policy in this sector should balance carbon sequestration with other co-benefits. The overall objective is to maintain NWL as a carbon sink and minimize the net GHG emissions associated with management, biomass disposal, and wildfire events.

Examples that could be considered include:

- Incorporate NWL conservation into local land use plans including adoption of a natural and working lands climate plan, land climate plan, and the recognition of the climate resiliency benefits of NWL
- Adopt policies that encourage management practices known to enhance carbon sequestration on NWL
- Adopt policies to expand and improve management of urban forests for net long-term carbon storage
- Adopt urban forestry and green infrastructure programs
- Adopt zoning to allow empty lots and other underutilized space to be converted into community gardens and greenspace
- Adopt ordinances preserving and enhancing carbon sequestration of wetlands, forests, croplands, and grasslands
- Adopt plans to conserve lands, water, and other natural features and resources for habitat function, watershed protection, air and water quality protection, and other ecosystem services
- Adopt ordinances preserving trees in urban areas through the review of proposed land use developments where trees are present on either public or private property
- Adopt plans and support projects for forest management activities to restore California forest lands that have high tree mortality and unnaturally dense fuel loads to a fire resilient condition that will mitigate wildfire size and severity
- Promote and encourage the development of value-added alternatives, such as composting, energy, biochar, and wood products to avoid open burning of forest biomass wastes
- Develop strategies to value the benefits of forest fuels reductions on upper-watershed water quality, quantity, and timing

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Agriculture

- Incorporate farmland conservation in local land use plans
- Provide incentives for carbon sequestration and carbon-based conservation farming techniques, including the use of biochar and compost from biomass wastes that would have otherwise been landfilled or open burned
- Promote value-added alternatives, such as composting, energy, biochar, and wood products, and prohibit open burning of agricultural biomass wastes
- Develop incentives to reduce applications of pesticides and fertilizers and increase use of compost
- Support development of farmers markets and provide guidance and support for local farmers, especially in disadvantaged communities
- Develop programs to encourage use of composting to enhance soil for carbon sequestration and soil healthy farms plans
- Promote grazing management and animal dietary strategies to reduce methane emissions from enteric fermentation
- Require best management practices for livestock waste for confined animal facilities

Figure 3 (continued)

Transportation and Land Use

- Update Lead Agency's transportation impact analysis guidelines and congestion management plans to comply with SB 743
- Adopt general plan policies and diagram designations and zone map and standards that are consistent with the Sustainable Communities Strategy
- In appropriate locations, adopt: 1) as-of-right zoning, and 2) design standards and guidelines, to enable mixed use, walkable, compact, infill development that includes a range of housing types and affordability levels
- Build infrastructure necessary for residential development in existing communities, and ensure any urban growth boundaries are paired with significant infill promotion strategies and removal of infill development barriers
- Streamline permitting and environmental review and reduce fees for construction of secondary units to promote infill in targeted areas

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- Streamline local permitting and siting for hydrogen fueling and electric vehicle (EV) charging infrastructure
- Adopt a jurisdiction-wide transportation demand management plan which sets numeric targets or caps for the proportion of non-single occupancy vehicle (SOV) trips associated with new development, and/or an overall vehicle miles traveled (VMT) target
- Require employer-based trip reduction programs and provide funding to support them if feasible
- Update code of ordinances to reduce parking requirements and eliminate parking minimums; impose parking maximums
- Institute paid parking for local on-street parking, structures and lots
- Adopt and implement EV and hydrogen readiness plans
- Adopt voluntary¹ green building standards that exceed minimum State building standards for EV Capable parking spaces (e.g., by requiring installation of EV chargers and/or a larger number of EV-capable parking spaces) or match local climate action plan goals
- Replace public fleet vehicles and trips with electric or alternative fueled vehicles as much as feasible and provide EV chargers in public spaces
- Adopt and implement a bicycle and pedestrian master plan which includes targets for trips taken by bicycle and on foot
- Adopt complete streets policies and active design guidelines
- Develop a transportation impact fee program to fund low-carbon transportation
- Support biogas use in the transportation sector
- Provide incentives for certifying development plans and projects using LEED for Neighborhood Development or similar third-party certification system.
- Partner with local/regional transit agencies to enhance transit ridership
- Adopt a Transportation Management Ordinance to require carpool, electric vehicle, and/or vanpool preferential parking spaces close to the major employment areas
- Adopt a Safe Routes to School Program that encourages youth to walk or ride bicycles to schools
 - o At schools where students drive, reduce the number of student parking spaces to encourage walking, biking and carpooling
- Develop Safe Routes to transit programs for pedestrians and bicyclists
- Develop intelligent traffic management systems to improve traffic flow
- Incentivize use of alternative fuel or high-fuel efficient vehicles by public agencies and private businesses
- Require local public agencies to contract with fleets that set targets and policies for lowering the average GHG emissions of their fleet vehicles
- Require clean vehicles be purchased as part of municipal vehicle fleet procurement

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- Adopt regional joint-purchase agreements to facilitate local fleets to purchase EVs, hybrids, telematics, and other technology that can reduce GHG emissions
- Require local specific plans for rideshare-designated parking spaces, new bus stops, employment centers, and commercial areas
- Expand transit and rail services and clean-fueled transit vehicles
- Promote ridesharing and last-mile connections
- Create incentives for electric landscaping power tools and off-road equipment
- Promote smart driving strategies through public education and outreach
- Restrict idling for all vehicles, especially in sensitive areas such as near schools

Waste Management

- Prohibit disposal of organic materials at landfills and/or prohibit the jurisdictions' hauler(s) and self-haulers from taking organic material to landfills
- Require edible food recovery programs; require collected organic waste materials be used as feedstock for composting and anaerobic digestion; include assessment of 15 years organics recycling capacity needs in the General Plan; and provide appropriate zoning in compatible areas for large and community-scale composting and digestion operations
- Implement residential and commercial waste prevention, recycling, organics collection, and edible food recovery programs to meet requirements of AB 341, AB 1826, and SB 1383
- Require generators of edible food to have contracts/agreements with food recovery organizations and prohibit edible food from being disposed or destroyed

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- Adopt ordinances to meet zero waste goals by 2020
- Adopt ordinances requiring hauling routes and fuels that minimize vehicle emissions compared to current practices (e.g., through use of renewable fuels, route optimization plan, etc.)
- Adopt a construction & demolition waste recycling ordinance (see CALGreen Divisions 4.4 and 5.4)
- Adopt an ordinance for zero waste from construction and demolition waste
- Adopt green building standards that include targets to exceed minimum State building standards for new construction, including requiring new construction to include bin space for organics recycling (see CALGreen Divisions 4.4 and 5.4 as well as Appendices A4.4 and A5.4)
- Require that landfills incorporate the financial impact of organics disposal reductions pursuant to SB 1383 into their Financial Assurance plans
- Create an effective solid waste management plan to reduce source generation and to divert waste from landfills to achieve emission reductions and address in General Plan
- Ensure compost materials meet standards to be used in rural lands application for carbon sequestration
- Expand anaerobic digestion capacity at existing wastewater treatment plants to allow them to accept food waste
- Require zero waste at public events, including food recovery and recycling
- Require food waste reduction at commercial facilities such as restaurants, hotels, hospitals, etc., including food donations
- Require large commercial landscapers and public projects to use compost-based nutrients and soil amendments on landscaping and plants instead of artificial fertilizers and soil amendments
- Implement recycled content procurement practices in all operations
- Implement a plan for food recovery for municipal food operations
- Establish waste diversion programs like "pay as you throw" where people pay per pick up amount

Water

- Adopt water-efficient landscaping ordinances (see CALGreen Divisions 4.3 and 5.3), including the use of compost and mulch, to reduce water use and encourage use of greywater for landscaping, when available
- Develop a plan requiring water recycling, and greywater and rain water reuse and provide funding for incentives and other program delivery mechanisms if feasible
- Develop a plan to quantify and reduce GHG emissions at publicly operated treatment works (POTWs)
- Develop a residential water efficiency auditing program
- Create an incentive program to promote efficient water use projects
- Eliminate Homeowner Association requirements for lawns and landscaping
- Work with local water agencies to evaluate the impact of proposed new developments and land use plans on groundwater and long-term water supply

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Short-Lived Climate Pollutants

- Require biogas generation at wastewater treatment plants and methane capture at landfill facilities
- Require that air conditioning and refrigeration units in new construction (and at major renovation) rely on refrigerants with low global warming potential (e.g., they use CO₂ or ammonia instead of hydrofluorocarbons)
- Promote alternatives to open pile burning as disposal options for woody biomass wastes
- Support hazardous fuel reduction, defensible space clearing and forest fuel reduction in rural forested areas with high tree mortality and unnaturally high fuel loads to reduce the size and severity of catastrophic wildfires which reduces the release non-anthropogenic black carbon and methane
- Adopt use of low global warming potential (GWP) alternative refrigerants

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- Work with local utility and waste management agencies to adopt a curbside program for old refrigerators, air-conditioning units, and automobiles to ensure proper disposal of refrigerants
- Adopt programs, ordinances, or regulations to reduce wood smoke from residents, commercial, and recreational activities
- Require alternatives to wood heating such as heat pumps or gas heating devices in new developments, in appropriate climate zones, where infrastructure is available
- Provide incentives to reduce wood smoke by changing out uncertified wood heating devices to gas, electric, or pellet devices
- Implement organics waste prevention, recycling, and food recovery programs

Green Buildings

- When determined to be feasible and achievable within the local jurisdiction, adopt “Tier 2” residential and commercial green building standards of the California Green Building Standards (CALGreen Code²), or a third party green building rating systems such as the LEED or GreenPoint Rated for new construction and existing building retrofits. CALGreen allows a local jurisdiction to adopt “Tier 2” as a more restrictive option. The California Health and Safety Code also allows local jurisdictions to adopt more restrictive building standards based on local conditions. Local jurisdictions also may adopt green rating systems, but in addition to the mandatory CALGreen requirements.
- Incentivize implementation of CALGreen Code building code voluntary provisions to divert and recycle construction and demolition waste, and use locally-sourced building materials and recycled content building materials, including mulch/compost, to the extent possible
- Adopt Guidelines for incentivizing new buildings to maximize energy conservation designs to promote passive solar energy generation, natural ventilation, effective use of daylight, and on-site electricity generation
- Encourage the use of on-site renewable energy combined with storage
- Link green building with transportation planning to encourage lowest possible transportation impacts
- Develop strategies and goals to reduce urban heat islands through cool roofs, urban forestry (shade trees) and cool non-roof surfaces, including covered parking areas with PV systems to provide shading
- Require cool roofs and/or green roofs on new construction, for all buildings or a subset (commercial, multi-family, etc.) of building types
- Require cool paving and/or light reflective permeable surfaces in sidewalks, patios, driveways, parking lots, or other paved areas³

Figure 3: CARB's 2017 Scoping Plan, Local Action Appendix (Mitigation Measures) ⁵

Construction

- Enforce idling time restrictions for construction vehicles
- Require construction vehicles to operate with the highest tier engines commercially available
- Divert and recycle construction and demolition waste, and use locally-sourced building materials with a high recycled material content to the greatest extent feasible
- Minimize tree removal, and mitigate indirect GHG emissions increases that occur due to vegetation removal, loss of sequestration, and soil disturbance
- Utilize existing grid power for electric energy rather than operating temporary gasoline/diesel powered generators
- Increase use of electric and renewable fuel powered construction equipment and require renewable diesel fuel where commercially available
- Require diesel equipment fleets to be lower emitting than any current emission standard

Operation

- Comply with lead agency's standards for mitigating transportation impacts under SB 743
- Require on-site EV charging capabilities for parking spaces serving the project to meet jurisdiction-wide EV proliferation goals
- Allow for new construction to install fewer on-site parking spaces than required by local municipal building code, if appropriate⁴
- Dedicate on-site parking for shared vehicles
- Provide adequate, safe, convenient, and secure on-site bicycle parking and storage in multi-family residential projects and in non-residential projects
- Provide on- and off-site safety improvements for bike, pedestrian, and transit connections, and/or implement relevant improvements identified in an applicable bicycle and/or pedestrian master plan
- Require on-site renewable energy generation
- Prohibit wood-burning fireplaces in new development, and require replacement of wood-burning fireplaces for renovations over a certain size developments
- Require cool roofs and "cool parking" that promotes cool surface treatment for new parking facilities as well as existing surface lots undergoing resurfacing

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- Require the use of energy-efficient lighting for all street, parking, and area lighting
- Require the landscaping design for parking lots to utilize tree cover and compost/mulch
- Incorporate water retention in the design of parking lots and landscaping, including using compost/mulch
- Require the development project to propose an off-site mitigation project which should generate carbon credits equivalent to the anticipated GHG emission reductions. This would be implemented via an approved protocol for carbon credits from California Air Pollution Control Officers Association (CAPCOA), the California Air Resources Board, or other similar entities determined acceptable by the local air district
- Require the project to purchase carbon credits from the CAPCOA GHG Reduction Exchange Program, American Carbon Registry (ACR), Climate Action Reserve (CAR) or other similar carbon credit registry determined to be acceptable by the local air district
- Encourage the applicant to consider generating or purchasing local and California-only carbon credits as the preferred mechanism to implement its off-site mitigation measure for GHG emissions and that will facilitate the State's efforts in achieving the GHG emission reduction goal

⁵ Ibid.

Operation (continued)

- Require solar-ready roofs
- Require organic collection in new developments
- Require low-water landscaping in new developments (see CALGreen Divisions 4.3 and 5.3 and the Model Water Efficient Landscape Ordinance [MWELO], which is referenced in CALGreen). Require water efficient landscape maintenance to conserve water and reduce landscape waste.
- Achieve Zero Net Energy performance building standards prior to dates required by the Energy Code
- Encourage new construction, including municipal building construction, to achieve third-party green building certifications, such as the GreenPoint Rated program, LEED rating system, or Living Building Challenge
- Require the design of bike lanes to connect to the regional bicycle network
- Expand urban forestry and green infrastructure in new land development
- Require preferential parking spaces for park and ride to incentivize carpooling, vanpooling, commuter bus, electric vehicles, and rail service use
- Require a transportation management plan for specific plans which establishes a numeric target for non-SOV travel and overall VMT
- Develop a rideshare program targeting commuters to major employment centers
- Require the design of bus stops/shelters/express lanes in new developments to promote the usage of mass-transit
- Require gas outlets in residential backyards for use with outdoor cooking appliances such as gas barbeques if natural gas service is available
- Require the installation of electrical outlets on the exterior walls of both the front and back of residences to promote the use of electric landscape maintenance equipment⁵
- Require the design of the electric outlets and/or wiring in new residential unit garages to promote electric vehicle usage
- Require electric vehicle charging station (Conductive/inductive) and signage for non-residential developments
- Provide electric outlets to promote the use of electric landscape maintenance equipment to the extent feasible on parks and public/quasi-public lands
- Require each residential unit to be "solar ready," including installing the appropriate hardware and proper structural engineering
- Require the installation of energy conserving appliances such as on-demand tank-less water heaters and whole-house fans
- Require each residential and commercial building equip buildings with energy efficient AC units and heating systems with programmable thermostats/timers
- Require large-scale residential developments and commercial buildings to report energy use, and set specific targets for per-capita energy use
- Require each residential and commercial building to utilize low flow water fixtures such as low flow toilets and faucets (see CALGreen Divisions 4.3 and 5.3 as well as Appendices A4.3 and A5.3)

Alexandra Weiss Roeser

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August 8, 2025

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

Re: Item 17(e) Long Beach Yacht Club Modernization Project, August 14 Meeting

Dear Commissioners and Staff:

I am writing to express my strong support for Item 17(e) on the August 14th Coastal Commission Agenda, approval of the application now pending before the California Coastal Commission regarding the modernization project at the Long Beach Yacht Club (LBYC). LBYC has been an invaluable community institution for nearly 100 years and has served the interests of sailors, community groups, families and non-profits throughout the Long Beach region. Modernization of their 1960's era facilities will allow LBYC to continue its community focused mission on education, boating, access to the water and increased social capital that has helped define its operations since 1929.

As a third-generation resident of Long Beach and a lifelong boater, I have a deep personal connection to our coastline and waterways. I learned how to sail in Alamitos Bay—an experience that not only sparked my passion for the water but also taught me invaluable life lessons: discipline, teamwork, responsibility, and leadership. Boating and sailing are far more than recreational activities; they are powerful tools for personal growth and community connection. Recently, I had the opportunity to look through a book highlighting the yacht club's history (LBYC was founded in 1929 by community leaders) published in 1962. It provided great perspective and reminded me that the mission of the yacht club is so much bigger than the here and now. The Long Beach Yacht Club plays an integral role in the story and fabric of Long Beach, connecting generations through a shared love of the water. Those who develop a love for our coast also gain a deeper understanding of the importance of protecting and preserving our precious coastal resources. Enhancing and preserving facilities like the yacht club ensures that future generations can access these same opportunities—to build skills, community, and a lasting respect for the marine environment. Supporting this legacy means investing in the values that have long defined and enriched our coastal city.

Now, as I raise a third-generation member of the Long Beach Yacht Club, I feel a deep responsibility and pride in continuing the legacy that shaped so much of my own life. Since becoming involved with LBYC in 1991, the club has been a cornerstone of my personal and community life. I believe so strongly in its mission that I have served on the Board of Directors for the past four years, working to ensure its values and impact endure for generations to come. Throughout my time in Long Beach, I've also served on numerous local boards and held leadership roles—including President and Chair positions—for several nonprofits. That background gives me a deep appreciation for the news that LBYC will now include a community room available for nonprofit use. It fills me with pride to know that the club will continue to be not just a hub for boating and sailing, but also a meaningful resource for community engagement and service. It reinforces what I've always believed: that instilling a love of our waterways and supporting the greater good go hand in hand—and that LBYC is uniquely positioned to lead in both.

In reviewing the application materials, it is clear that the project before you meets and exceeds the Coastal Commission's criteria for successful development. It balances the needs of club members, the broad boating community, neighborhood groups, labor and other stakeholders and furthers the LBYC's

commitment to delivering exemplary benefits to the Coastal California community. These benefits will include a new dedicated Community Room open to non-profit organizations throughout the region, free sailing classes for the youth of Long Beach and assistance with access to the Coast and Pacific Ocean. The project is also sensitive to the transportation, environmental and operational impacts of the development process and in the finished project.

I strongly support the approval of this project and look forward to the Coastal Commission's support of this vital community institution.

Regards,

Alexandra Weiss Roeser
alexandrawroeser@gmail.com

From: SouthCoast@Coastal
To: [Vaughn, Shannon@Coastal](mailto:Vaughn,Shannon@Coastal)
Subject: FW: Support for the <odernization project at the Long Beach Yacht Club (LBYC)>
Date: Friday, August 8, 2025 5:10:54 PM

From: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Sent: Friday, August 8, 2025 12:24 PM
To: Sy, Fernie@Coastal <Fernie.Sy@coastal.ca.gov>; SouthCoast@Coastal <SouthCoast@coastal.ca.gov>
Subject: FW: Support for the <odernization project at the Long Beach Yacht Club (LBYC)>

From: Lee Collier <commodore@scya.org>
Sent: Friday, August 8, 2025 10:43 AM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Cc: Lorraine Collier <LorraineCollier@verizon.net>; Rick von Heydenreich <rickvonh@gmail.com>
Subject: Support for the <odernization project at the Long Beach Yacht Club (LBYC)>

Dear Commissioners and Staff:

I am writing on behalf of the Board of Directors of the Southern California Yachting Association, an Association of 86 yacht clubs, to express our strong support for the approval of the application now pending before the California Coastal Commission regarding the modernization project at the Long Beach Yacht Club (LBYC). LBYC has been an invaluable community institution for nearly 100 years and has served the interests of sailors, community groups, families and non-profits throughout the Long Beach region. Modernization of their 1960's era facilities will allow LBYC to continue its community focused mission on education, boating, access to the water and increased social capital that has helped define its operations since 1929.

In reviewing the application materials, it is clear that the project before you meets and exceeds the Coastal Commission's criteria for successful development. It balances the needs of club members, the broad boating community, neighborhood groups, labor and other stakeholders and furthers the LBYC's commitment to delivering exemplary benefits to the Coastal California community. These benefits will include a new dedicated Community Room open to non-profit organizations throughout the region, free sailing classes for the youth of Long Beach and assistance with access to the Coast and Pacific Ocean. The project is also sensitive to the transportation, environmental and operational impacts of the development process and in the finished project.

We strongly support the approval of this project and look forward to the Coastal Commission's support of this vital community institution.

Regards,

Lee Coller

Commodore, Southern California Yachting Association

commodore@scya.org

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Lee Coller

Commodore

Southern California Yachting Association

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To: The California Coastal Commission

From: Sierra Club California

Re: Agenda Item Th17e, Application # 5-24-0767, CA Coastal Commission meeting, August 2025

Applicant: Long Beach Yacht Club

Project Location: 6201 Appian Way, Long Beach, 90803 (APN: 7242-014-900)

Project Description: The project includes the remodel of and addition to the existing 21,026 sq. ft. Long Beach Yacht Club Main Building/Clubhouse, which also includes the demolition of the adjacent existing pool and pool deck and construction of a new attached three-story Pool Building with a new pool and deck, multipurpose rooms, restrooms, classrooms and terraces. The additions total 20,179 sq. ft. for an overall post project total of 41,205 sq. ft. Grading will consist of 207 c.y. of cut and 54 c.y. of fill for recompaction purposes. Any remaining grading from the cut will be exported to a location outside of the Coastal Zone.

Sierra Club California's Position: Postponement or Denial of CDP until revised per our recommendations.

Concerns

Staff states that, "The primary issues raised by this project concern protection of public access and water quality." We will comment on public access, construction staging, impacts to an existing coastal bird rookery on and adjacent to the project site, and Environmental Justice and CEQA concerns.

Public Access: The Long Beach Yacht Club is a private club operating in a public structure on public property, essentially limiting public access to this coastal resource and section of the coast to members only. This Project will expand the facility, while continuing to deny the general public equal access to that granted to members of the Long Beach Yacht Club. Additionally, the Project will further reduce availability of public parking in Basin 4 public lot and on neighborhood streets. Traffic congestion and parking demands will increase, especially during construction and during special events. This will limit public access to Basin 4 boat slips and parking, to nearby coastal recreational sites including Mother's Beach and Marine Stadium, and to residents and visitors in the neighborhood.

Coastal Resources: Biological Impacts of the Project include temporary and permanent threats to this unique and endangered coastal bird rookery, historically and/or currently located in trees on the project site and, in the Basin 4 parking lot, and in adjoining green spaces and public parkways.

Equity/Environmental Justice: Expansion and renovation of the existing structure provides little public benefit to Long Beach residents or coastal visitors. The State owns tidelands property within the project area and the City owns the structure itself. However, other than for scheduled meetings and events, access to the facility and gated parking lot is restricted to members and guests of the Long Beach Yacht Club, a private organization whose membership fees and dues are costly. Additionally, this private entity has never and does not now pay market value to lease the facility from the City of Long Beach. Finally, there has been an orchestrated lack of equal opportunity for public comment with

respect to the City's approval of this Project, including failure to require an EIR and hold public hearings under CEQA.

CEQA: In denying a full CEQA review, the City of Long Beach fast-tracked a major construction project that will have significant short and long-term impacts on our public lands, public waters, and community. Unless this CDP is revised to require an EIR, there will be no way to determine if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

PUBLIC ACCESS

PARKING

Special Condition 15 requires a Final Transportation Management Program (TDMP), however, the suggestions are all voluntary and do not prevent Yacht Club members or employees from parking in the Basin 4 Public Parking Lot adjacent to the Yacht Club or on public streets in the neighborhood. Public parking in both the Basin 4 public lot which has 316 parking spaces and on neighborhood streets will be impacted by this expansion both during and after construction.

A parking demand analysis concluded that there would not be enough private on-site parking for the existing and proposed demand as the club's private on-site gated lot has only 72 spaces. After the proposed expansion, the number of permanent staff, who currently park in the Basin 4 public lot is expected to double in size to 160 employees. Also, during construction, contractors and crew members will need parking as well.

Additionally, the public will be unlikely to find parking spaces in public lots or on adjacent streets during the Long Beach Yacht Club's numerous Special Events (ten a month, along with ten additional large sailing competition events per year). City Planning documents show that as many as 284 spots would be required during each special event. The Yacht Club has indicated that they have secured additional offsite parking through a long-term lease for eighty parking spaces available at the Golden Sails Hotel (6285 E Pacific Coast Hwy, Long Beach, CA 90803), as another source to provide parking to meet demand generated by the Yacht Club. However, this amount of spaces is inadequate for Special Events and there is no mention of providing transportation from the motel parking lot to the Yacht Club a mile away. Proposing that members and staff voluntarily use alternative means of transportation is unrealistic and demands no accountability on the part of the Project Applicant.

We advise that the TDMP be revised to require that the Long Beach Yacht Club provide off-site parking for employees (without charge), for members and their guests, and for any and all attendees at any Long Beach Yacht Club events taking place at this facility. A shuttle service from off-site lots should also be provided at no charge to employees. During construction, off-site parking must be secured for all construction equipment and for the vehicles of construction workers. "Off-site" meaning a parking lot other than the public lots in Alamitos Bay Marina, Mother's Beach, and Marine Stadium, or along public streets.

CONSTRUCTION STAGING PLAN

Special Condition 17. Final Construction Staging Plan.

A. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the Applicant shall submit for the review and approval of the Executive Director, two (2) full size sets of a Final Construction Staging Plan that indicates that the construction staging area(s) and construction corridor(s) will minimize public access impacts to the sandy public beach.

(1) The plan shall demonstrate that:

(a) Construction equipment, materials or activity shall not occur outside the staging area and construction corridor identified on the site plan required by this condition;

- (b) Construction equipment, materials, or activity shall not be placed outside of the construction staging area or corridor identified in subsection (a) of this special condition, including but not limited to, in any public parking lot, or within the adjacent public walkway at any time;
- (c) The construction staging area will gradually be reduced as less materials and equipment are necessary;
- (d) The construction access route will only be intermittently closed for transport of equipment and materials. When not in use for transportation of equipment and materials, it will be made available for undisrupted public access;
- (e) No construction staging shall take place in the public walkway adjacent to Alamitos Bay that fronts the Yacht Club nor in the Basin 4 public parking lot. Additionally, no construction staging areas shall be located near these areas that will impact the ability of the public to access them.

This CDP should be revised to require the submission of Staging Area Plans (including specific staging areas and their projected impacts to coastal access and to coastal resources, residents, and visitors), before, not after, approval of the CDP. Looking at the project site and surrounding area, there is very little space for storage of demolition and construction equipment and materials or of debris on-site (eliminated under current CDP). Due to the negative impacts on coastal access and to coastal residents, visitors, habitats and wildlife, staging areas should not be located in public parking lots (including Basin 4 public lot, any other Alamitos Bay Marina parking lots, Mother's Beach or Marine Stadium public parking lots), nor on public streets, nor in public right of ways.

BIOLOGICAL IMPACTS ON COASTAL RESOURCES

A well-established coastal bird rookery for Black Crowned Night Herons, Yellow Crowned Night Herons, Snowy Egrets, and Great Blue Herons is located in trees throughout Basin 4 Parking Lot, in the roundabout at the east end of Appian Way, and on green spaces and parkways along Alamitos Bay and Appian Way. As the Commission already knows, local and migratory coastal bird populations dependent on Alamitos Bay, the adjoining Los Cerritos Wetlands, the San Gabriel River, local beaches and the Port of Long Beach are in serious decline. This is primarily due to human activity and habitat loss, including expanding public and private development, air and water pollution, and increased recreational, residential, commercial, and industrial activities. Without intervention, this rookery and other local coastal bird roosting and nesting sites will not survive. Consequently, the health of the local coastal ecosystem, including the Los Cerritos Wetlands, will also decline.

We advise that this CDP not be approved until a proactive plan ensuring proper protection for this coastal bird rookery has been submitted to the Coastal Commission by the City of Long Beach and agreed to be the Long Beach Yacht Club. This plan should include:

Educational signage acknowledging and describing the rookery and the benefits of protecting coastal birds and their roosting and nesting sites.

Restriction of parking under nesting trees during nesting season, and reduction of annual tree trimming of trees on the Project site, and in this section of the Alamitos Bay Marina and adjoining public areas, including Basin 4 parking lot, parkways, and green spaces.

Redesign and or creation of landscaped areas on the Project site, in Basin 4 and adjoining green spaces and parkway to promote the health and safety of nesting coastal birds. Areas immediately below nesting sites where chicks and juveniles fall and forage should not include rocks and/or hardscapes and should be cordoned off during nesting season.

Because this CDP fails to protect this coastal bird rookery on and adjoining the Project Site, it allows the proposed Project to negatively impact nesting and roosting coastal and migratory birds in violation of the Coastal Act.

Specifically:

Special Condition 12, Breeding and Nesting Bird Surveys During Construction states that: Bird surveys, monitoring, and accommodation for impacts, are limited to 500 ft. for surveys and 300 ft for active nests for construction noise levels and mitigation.

By limiting the distance from the project site to 500 ft or even 300 ft for surveys, monitoring, and accommodations for nesting birds and providing no accommodations for roosting birds, **Special Condition 12 excludes current rookery nesting and roosting sites. All of which will be negatively impacted by this Project.**

In order to protect the rookery, a critical and endangered coastal and biological resource, **Special Condition 12 must be revised to require surveying, monitoring, and accommodating project impacts to all existing and potential nesting and roosting trees in Basin 4 parking lot, the roundabout at the east end of Appian Way, and adjacent green spaces and public parkways.**

Additionally, **Special Condition 12 does not mandate bird surveys during nesting season, thereby failing to provide a baseline to determine current and future rookery populations. Without such surveys, it is not possible to project potential and determine ongoing project impacts on current rookery populations and active nesting sites, nor to propose essential Project accommodations, nor to evaluate the negative consequences of the Project to this rookery, an invaluable coastal resource.**

Special Condition 12 must be revised to mandate surveys of all existing and potential nesting and roosting sites within this rookery must be conducted during the nesting season prior to any proposed construction activities, during each subsequent nesting season throughout the construction process, and for five years after the Project is completed to both prevent and determine the negative impacts of this Project on this coastal bird rookery.

Additionally,

Because of the location, size, and scope of this Project, the CDP must be amended to prohibit construction during nesting season.

Special Condition 6, Storage of Construction Materials Mechanized Equipment and Removal of Construction Debris states that (1) No demolition or construction materials, equipment, debris, or waste shall be placed or stored where it may enter sensitive habitat, receiving waters or a storm drain, or be subject to wave, wind, rain or tidal erosion and dispersion. **Language should be added to this Special Condition that specifically prohibits storage of the above at any time in Basin 4 parking lot or any other Alamitos Bay Marina parking lot, or in public lots at Mother's Beach or the Marine Stadium, or on Appian Way, or on any public street nearby. Additionally, Special Condition 6 should be revised to prohibit the washing or maintenance of machinery or equipment and/or use of any thinners or solvents in the above locations.**

Special Condition 8, The Final Low Impact Development Plan, states that:

(3) Irrigation and **the use of landscaping chemicals such as fertilizers and pesticides shall be minimized to the extent feasible** through options such as the use of low-maintenance landscaping, drought-resistant native plants, Integrated Pest Management, and an efficient irrigation system;

(4) The parking lot(s) shall be swept with a vacuum regenerative sweeper a minimum of once weekly;
(5) Trash, recycling and other waste containers, as necessary, shall be provided. All waste containers anywhere within the development shall be covered, watertight, and designed to resist scavenging animals.

Because coastal bird and other wildlife forage on the project site and in the immediate area, this Special Condition must be revised to:

Prohibit the use of any and all fertilizers, herbicides, and pesticides known to negatively impact coastal birds and wildlife on the Project site, within Basin 4 (public parking lot, walkways, and docks), on adjoining public green spaces, on the roundabout, and on public parkways along this section of Appian Way.

Prohibit vacuum sweeping and/or leaf blowers during nesting season near or under active and potential roosting and nesting sites on the Project site, in Basin 4 parking lot, on adjacent green spaces, and on public parkways.

Require the removal of existing waste containers under trees in Basin 4 parking lot and prohibit any future placement of waste, recycling, or storage containers under trees in Basin 4 parking lot.

Special Condition 13. Final Tree Replacement Plan and Bird and Tree Monitoring Plan.

The project site, being the public property on which the Yacht Club and its private parking lot are located, has few trees, and will have less after this expansion. Due to annual trimming and current and projected human activity, existing and replacement trees within the Project area are not likely to be or become nesting sites for coastal birds.

Therefore, in order to sustain the health of coastal resources and this rookery in particular, Special Condition 13 should be revised to include all trees within Basin 4 parking lot, and adjoining public green spaces and parkways.

Additionally replacement trees should not necessarily be located within the Project area where public usage will be highest thereby discouraging coastal birds from nesting. Rather, replacement trees should be planted where rookery birds are most likely to nest, i.e. in Basin 4 parking lot, in the roundabout, in the parkway along the bay adjoining the Yacht Club and in the parkway along Appian Way adjoining Basin 4 parking lot.

13A should be revised to include the removal of any trees within Basin 4 Parking lot, and/or adjoining green spaces and public parkways and to require that all replacement trees be as mature as possible and be those species most suitable for coastal bird roosting and nesting.

13Ciii should include cumulative impacts to habitat that supports shorebirds and other coastal birds within the coastal bird rookery, include those roosting and nesting in the Basin 4 Parking lot, and/or in adjoining green spaces and public parkways.

Special Condition 16. Final Public Access Signage Plan should be revised to include the signage relevant to the coastal bird rookery located on and adjacent to the Project site and to coastal birds in general which should include a map of this and other local coastal rookeries and descriptions/images of local coastal birds. Signage language should:

**Describe the benefits of coastal birds and rookeries to the local coastal ecosystem,
Inform the public of the historic, current, and projected numbers of local coastal birds,
Detail the reasons that coastal bird rookeries and coastal bird population are in decline and**

describe measures that are being taken or can be taken to ensure their survival.

Additionally, specific signage prohibiting parking and public access to areas below active nesting sites, especially during, but not limited to, nesting season.

EQUITY/ENVIRONMENTAL JUSTICE

Who will enjoy the benefits of this expanded facility, owned by the City of Long Beach and built on state tidelands? Only a select few. Currently the fee to join the Long Beach Yacht Club is \$12,500. Monthly dues are \$455 and members must spend a minimum of \$240 on food and beverages at the club per quarter. The average income of a Long Beach resident is \$40,293, putting club membership well out of reach.

While it is the City, not the Coastal Commission who determines the amount of leases, fees for special events, and other fees, it is worth noting that the Long Beach Yacht Club leases this public property for only \$1620 per month under its current fifty year lease, well below market value. The club and its members and guests are routinely excused from special event fees such as dock fees for regattas and other special events whose participants are also more likely to be affluent than not.

Although the club's good works and donations are duly acknowledged, charity is no substitute for equity. It is a known fact that local Tidelands Funds and other public monies have never been and are not now equitably spent across our local coastal zone. The results being that the majority of Long Beach residents and low-income visitors to Long Beach continue to lack equal access to coastal resources while a wealthy, primarily white, minority finds their historic privilege to coastal access enshrined and expanded.

Special Condition 3 No Future Shoreline Protective Device, C. Removal and Relocation Plan

Prior to removal/relocation, the permittee shall submit two copies of a Removal/Relocation Plan to the Executive Director for the review and written approval. The Removal/Relocation Plan shall clearly describe the manner in which such development is to be removed/relocated and the affected area restored so as to best protect coastal resources, including the Pacific Ocean. In the event that portions of the development fall to the beach or are submerged before they are removed, **the landowner shall remove all recoverable debris associated with the development from the beach and ocean and lawfully dispose of the material in an approved disposal site and relocate any salvageable portions of the development inland.** Such removal shall require a coastal development permit.

Making the landowner, rather than the Project Applicant, entirely responsible for removal and relocation of the proposed structure, places the entire burden on public agencies rather than on the private entity requesting and benefiting from this CDP. As stated above, the general public, most especially low-income and marginalized residents and coastal visitors, will have little to no access to the Project site and proposed facility. Additionally, Tidelands Funds and other public monies are much needed to maintain and/or remove existing public structures increasingly at risk from sea-level rise, especially those located in low income coastal areas and/or benefitting marginalized populations. We therefore recommend that in full or at least in part the Alamitos Bay Yacht Club be responsible for funding the removal and relocation of the proposed structure.

Special Condition 4. Assumption of Risk, Waiver of Liability and Indemnity. C. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit: (1) a copy of a recorded lease agreement, in a form and content acceptable to the Executive Director...

The Project Applicant, the Long Beach Yacht Club, has never paid market value for the enjoyment of this public coastal resource. Its current 50 year lease with the City of Long Beach is well below market value and much less than what the average private property on Naples Island is leased for. Therefore, members of this private club, enjoy exclusive access to publicly owned coastal amenities including a clubhouse, docks, and parking lot at the expense of other local residents and coastal visitors who are denied both access and income that could be spent on acquiring and maintaining coastal areas and amenities serving marginalized populations.

We therefore conclude that maintaining and/or extending the current lease agreement is not environmentally just and should not be declared “acceptable to the Executive Director.” We propose that the CDP be amended to require that the current fifty year lease between the City of Long Beach and the Project Applicant be revised to mirror average private property lease rates on Naples Island and also be adjusted annually to reflect any increase in the average lease rates of Naples Island properties. If the lease cannot be legally amended, we propose that it not be renewed and that a new lease be negotiated requiring the Long Beach Yacht Club to pay lease rates equal to the average private property lease rates on Naples Island and be adjusted annually to equal any increase in the average private property lease rates on Naples Island.

The Coastal Act’s Environmental Justice Policy acknowledges the need to increase public participation in decision making regarding coastal access and coastal resources. **The City’s failure to conduct a full EIR for this Project should not be echoed by the Coastal Commission’s determination that the Project is categorically exempt from CEQA, thereby denying that legitimate CEQA concerns have yet to be addressed through public hearings.**

Additionally, we propose as a condition of this CDP that the Long Beach Yacht Club be required to submit a plan to provide greater and more equitable public access to the existing and proposed facility for Long Beach residents and coastal visitors, especially those from historically marginalized groups.

CEQA

J. California Environmental Quality Act (CEQA) Section 13096 of Title 14 of the California Code of Regulations requires Commission approval of Coastal Development Permit applications to be supported by findings showing the approval, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of **CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.**

In this case, the City of Long Beach is the lead agency, and the Commission is a responsible agency for the purposes of CEQA. **The City of Long Beach determined on September 9, 2024, that the proposed project is categorically exempt from CEQA pursuant to CEQA Guidelines Class 1 (Section 15301, Existing Structures) and Class 2 (Section 15302, Replacement or Reconstruction).** As a responsible agency under CEQA, the Commission has determined that the proposed project, as conditioned, is consistent with the development and land use, public access and recreation, hazards, biological resources and water quality policies of the Coastal Act. As conditioned, there are no feasible alternatives or feasible mitigation measures available that would substantially lessen any significant adverse impact that the activity may have on the environment. Therefore, the Commission finds that the proposed project can be found consistent with the requirements of the Coastal Act to conform to CEQA.

Clearly, the size and scope of this Project is no mere remodel of an existing structure, but an expansion which doubles the size of the existing structure and involves significant temporary and permanent impacts to the community and to the environment. Therefore, the City of Long Beach violated CEQA by failing to require an EIR for this Project. Due to this decision by the City of Long Beach, the general public has been denied the opportunity of a full review of the environmental impacts of the project under CEQA as well as the right to an opportunity to comment on the project during public hearings. Should the Coastal Commission also determine that the project is categorically exempt from CEQA, there will be no means to determine whether a more environmentally feasible alternative exists. Compliance with environmental and environmental justice provisions of CEQA as well as the Coastal Act, require that the Coastal Commission deny or postpone approval of this CDP until a full Environmental Impact Report is done.