

**CALIFORNIA COASTAL COMMISSION**

ENERGY, OCEAN RESOURCES AND FEDERAL CONSISTENCY

455 MARKET STREET, SUITE 300

SAN FRANCISCO, CA 94105

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# Th8a

**9-25-0458 (Los Cerritos Wetlands, LLC & Los Cerritos Wetlands  
Authority)**

**August 14, 2025**

**Correspondence**



# Los Cerritos Wetlands Authority

## Governing Board

Kristina Duggan,  
Chair  
City of Long Beach

Joe Kalmick,  
Vice Chair  
City of Seal Beach

Amy Hutzell,  
Board Member  
Coastal Conservancy

Roberto Uranga,  
Board Member  
Rivers and  
Mountains  
Conservancy

Mark Stanley  
Executive Officer

August 12, 2025

California Coastal Commission  
Mr. Joseph Street, EORFC Program Manager  
455 Market Street, Suite 300  
San Francisco, CA

## RE: Acceptance of Co-Applicant Status for Coastal Development Permit Application 9-25-0458 – Synergy Southern Site Restoration


Dear Mr. Street,

The purpose of this letter is to advise you that, per Section 30601.5 of the Coastal Act, the Los Cerritos Wetlands Authority (LCWA) acknowledges itself as a Co-Applicant with Los Cerritos Wetlands, LLC in the Coastal Development Permit Application for the Synergy Southern Site Restoration project. The LCWA, to the best of its knowledge, finds the contents of CDP Application No. 9-25-0458 to be true, complete, and accurate. The LCWA was also a co-applicant in 2018 for the project's initial CDP (No. 9-18-0395).

The Project site consists of the parcels known collectively as the Synergy Oil Field site. The parcels are generally bounded by Pacific Coast Highway to the west, Second Street to the south, the Los Cerritos Channel to the north, and Studebaker Road to the east. The LCWA is currently the owner of the "Northern Synergy Oil Field Site" and the Phase 2 expansion overlaps with a portion of the LCWA owned land. Once this project has been completed and met its performance standards the LCWA will acquire ownership of the entirety of the Synergy Oil Field Site per an existing land exchange agreement between the LCWA and Los Cerritos Wetlands, LLC.

If you have any questions, please contact Chad Oberly 626-492-0593 or email [coberly@rmc.ca.gov](mailto:coberly@rmc.ca.gov).

Sincerely,

DocuSigned by:  
  
3EF0743E521D4ED...  
Mark Stanley  
Executive Officer



**LOS ANGELES COUNTY  
SANITATION DISTRICTS**  
*Converting Waste Into Resources*

**Robert C. Ferrante**  
Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
(562) 699-7411 • www.lacsd.org

August 8, 2025

Ref DOC 7557711

VIA EMAIL: [EORFC@coastal.ca.gov](mailto:EORFC@coastal.ca.gov)

California Coastal Commission  
Energy, Ocean Resources, and Federal Consistency Division  
455 Market Street, Suite 300  
San Francisco, CA 94105

To Whom It May Concern:

**Notice of Public Hearing Response to  
The Upper Los Cerritos Wetlands Restoration and Mitigation Bank (CDP 9-25-0458)**

The Los Angeles County Sanitation Districts (Districts) received a Notice of Public Hearing for the subject project located in the City of Long Beach on August 4, 2025. The proposed project is located within the jurisdictional boundaries of District No. 3. We have reviewed the associated staff report and exhibits and offer the following comments:

1. The Districts own, operate, and maintain the Marina Relief Trunk Sewer Section 4, and hold associated sewer easements, within the west side of the proposed project area (APNs 7237-017-013, 7237-017-014, 7237-017-019, and 7237-022-012) that may be affected by the proposed project.
2. Approval to construct improvements over or near a Districts' sewer and/or within a Districts' sewer easement is required before construction may begin. For a copy of the Districts' Buildover procedures and requirements, please visit [Buildover Procedures | Los Angeles County Sanitation Districts](#). For more specific information regarding the Buildover procedures, and to obtain a copy of the sewer record drawings and sewer easements within the project area, please contact Mr. Ryan Honda, Project Engineer in the Districts' Property Management Group, at (562) 908-4288, extension 2766, or [ryanhonda@lacsd.org](mailto:ryanhonda@lacsd.org).
3. To help facilitate the proposed project, the Districts are open to allowing the California Coastal Commission to abandon in-place or remove the Marina Relief Trunk Sewer Section 4, since it only serves the Synergy Oil Field site. The Districts will evaluate this option further as part of the Buildover review process.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or [mandyhuffman@lacsd.org](mailto:mandyhuffman@lacsd.org).

Very truly yours,

*Mandy Huffman*

Mandy Huffman  
Environmental Planner  
Facilities Planning Department

SP:MNH:mnh

cc: R. Honda

DOC 7562473.D03

**From:** anngadfly@aol.com <anngadfly@aol.com>

**Sent:** Saturday, August 9, 2025 10:40 AM

**To:** Vaughn, Shannon@Coastal <Shannon.Vaughn@coastal.ca.gov>

**Cc:** Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov>;  
SouthCoast@Coastal <SouthCoast@coastal.ca.gov>

**Subject:** Th8a comments resent

Dear Ms. Vaughn,

The following comments were sent yesterday, Aug. 8 at 4:50 by Nancy Okaka on behalf of Sierra Club CA. The comments were mistakenly labelled as Th18a when they concern Th8a, The Los Cerritos Wetlands.

Nancy received a message from you stating you were unable to open the attachment containing the comments. I and others have been able to open this attachment, but in the event that you are still unable to access the comments, I have copied and pasted them below. We respectfully ask that these be shared with the staff and commissioners.

Gratefully,

Ann Cantrell

Sierra Club CA

To: California Coastal Commission

From: Sierra Club California

Re: Agenda ItemTh8a, CA Coastal Commission Meeting, August 14, 2025.

Application No.: 9-25-0458

Applicant: Los Cerritos Wetlands, LLC.

Project Location: Southern Synergy Oil Field Site, 6433 E. 2nd St., City of Long Beach, LA County.

Project Description: Phase 2 expansion of a previously-approved wetlands restoration project, including: 1) tidal channel creation, targeted grading, and plantings to re-establish an additional 77 acres of tidal wetlands, as well as transitional and upland habitats; 2) construction of a berm around portions of the site; 3) modifications to visitors' center parking and picnic areas and pedestrian trail; 4) preservation of historic well site and installation of interpretive signage; (5) restoration of at least 0.4 acres outside the

Mitigation Bank to resolve an existing Coastal Act violation that occurred on the property; and (6) authorization for the Executive Director to sign an amendment to the Bank Enabling Instrument for expansion of the existing Upper Los Cerritos Wetlands Mitigation Bank.

## **Comments and Concerns**

### **STAFF REPORT**

#### **SUMMARY OF STAFF RECOMMENDATION (page 2/3)**

The project will be carried out on the southern, 86-acre portion of the 154-acre Synergy site, an area historically used for oil production. (page 2)

**Comment: Correction needed. The project area has not only been historically used for oil production, but also currently used for oil production.**

Staff: “These restoration efforts are designed to enhance ecological function, improve tidal exchange, reestablish and enhance habitat for special-status plant and animal species, and support long-term climate resilience.... the current proposal accelerates restoration by allowing both the northern and the southern portions of the site to be restored concurrently, significantly advancing the timeline for full ecological recovery.” (page 2)

**Comment: The consequences of expanding and accelerating the loss of existing habitat is not addressed. Rather than support climate resilience, this accelerates a transition that would occur gradually as sea levels rise. Seasonal wetlands supported by annual rainfall will be erased and replaced by a man-made salt marsh. This comes at the expense of the current ecosystem. If approved, this expanded restoration of the entire northern portion of the Los Cerritos Wetlands will likely take place concurrent with the already approved Southern Los Cerritos Wetlands Restoration Project. Where will all the wildlife go when most of the Los Cerritos Wetlands is under construction at the same time?**

**We propose that this CDP be revised to include a Project Alternative for the Southern Synergy Oil Field site that does not create a salt marsh monoculture but instead retains, enhances, and restores the current and historic diversity of this coastal wetlands ecosystem.**  
**Comment: The LCWA has not yet submitted a CDP request to the Coastal Commission for its Conceptual Restoration Plan, which, therefore, cannot and should not be assumed to be in compliance with the Coastal Act. Instead the LCWA has piecemealed its Program EIR, seeking and being granted multiple CDPs from the Coastal Commission. This questionable, and possibly illegal strategy, has resulted in CDPs which neither address the full scope and impacts of the Conceptual Restoration Plan nor address the consequences of permitting a significant**

**increase in oil production permitted by the Los Cerritos Wetland Oil Consolidation and Restoration Project.**

**Likewise this Applicant and CDP fail to address either the full scope of wetlands restoration or the expansion of oil production, nor does staff comment on these omissions. The staff report references only “the consolidation of oil operations within a reduced footprint on an offsite property...”, failing to mention that current oil production will expand astronomically or that this offsite property is adjacent to the official Los Cerritos Wetlands and includes active wetlands areas.**

**Specifically, we believe that before this CDP can be permitted, the Coastal Commission must determine if the Project Applicant, Los Cerritos Wetlands, LLC, is legally able to both sell and purchase mitigation credits from the Upper Los Cerritos Wetlands Mitigation Bank to mitigate its proposed drilling operations. As stated in the CDP for the Los Cerritos Wetland Oil Consolidation and Restoration Project, due to the amount of gas being released from proposed drilling operations, the purchase of mitigation credits is the only possible and permitted mitigation. As both the Mitigation Banker of the Upper Los Cerritos Wetland Mitigation Bank and the entity drilling on the Pumpkin Patch, will the Los Cerritos Wetlands, LLC be able to both sell and purchase mitigation credits to offset pollution on the Pumpkin Patch site? Will Los Cerritos Wetlands, LLC benefit financially or otherwise from this exchange? Is this not what Dr. Kate Hucklebridge has referred to and questioned as “double dipping”?**

**We propose that this CDP specifies that Los Cerritos Wetlands, LLC cannot purchase mitigation credits from the Upper Los Cerritos Wetlands Mitigation Bank or any Los Cerritos Wetlands Mitigation Bank to offset emissions from oil operations on the Pumpkin Patch site.**

**Comment: Will the Pumpkin Patch drilling site be subject to SB 1137 (requiring no new oil wells and health and safety accommodations for existing wells within 3200 feet of sensitive receptors)? CalCEM has granted the Los Cerritos Wetlands, LLC 42 drilling permits for new wells at this site,**

**issuing some on the same day that SB 1137 went into effect. CalGEM has been persuaded that wetlands restoration is dependent on these new wells being permitted. We understand that Los Cerritos Wetlands, LLC is currently seeking an exemption from SB 1137 from CalGEM for oil operations on this site, by continuing to argue that drilling here is required for wetlands restoration per the Los Cerritos Wetland Oil Consolidation and Restoration Project.**

**We propose that this CDP not be granted unless and until the Project Applicant, Los Cerritos Wetlands, LLC agrees to fully comply with SB 1137 on all drilling sites it owns and/or operates. If necessary, this could become a Special Condition of this CDP. Restoration of the Los Cerritos Wetlands must not be used as a bargaining chip to evade health and safety provision of state law. We would further note that the Coastal Commission has approved three multiple story mixed use (residential and commercial structures) at the same intersection as the Pumpkin Patch drilling site. Thousands of people will reside and shop within a few hundred feet of active oil wells and storage tanks on this site.**

## **II. Motions and Resolutions**

**Comment, as currently written, we recommend a NO vote on these Motions and Resolutions**

## **III. SPECIAL CONDITIONS (page 7 - 19)**

**2. Final Plans Comment: Add a Tribal Cultural Resources Plan to Include areas set aside for local tribal members to plant and gather indigenous plants for ceremonial and cultural use and access by tribal members to the Project site for ceremonial and cultural purposes.**

### **5. Biological Resource Protection Plan (BRPP)**

**Comment: Include plans to accommodate increased disturbance of and threats to marine life and wildlife due to larger scope of habitat and foraging areas undergoing change/destruction simultaneously. No work on the site should be done during nesting and breeding seasons.**

### **10. Oil Spill Prevention and Response Plan**

**Comment - add Oil Drilling, to the Oil Spill Prevention and Response Plan. Comment on the impact of continuing Tesoro drilling operations adjacent to the Project site and address impacts of drilling on the Pumpkin Patch site, including additional impacts to wetlands and wetlands visitors if this site is exempt from SB 1137.**

### **12. Protection of Cultural Resources.**

**Comment: Cultural Resources must include Tribal Cultural Resources as defined by indigenous peoples to include all Relations: plants, animals, and other. A Tribal Cultural Resource Plan should be established to include:**

**a. Tribal Monitors presence not only during excavation of soils but throughout the entire restoration.**

**b. The Project Applicant must provide monetary compensation for tribal monitors representing different tribal entities. Rotation of paid tribal monitors, which limits the ability of any monitor to properly observe ongoing restoration activities, is unacceptable.**

**c. A Tribal Cultural gathering area, established and maintained by tribal members.**

**d. The planting and gathering of native plants for tribal cultural purposes by tribal members.**

**e. Access to Project site for tribal members engaging in ceremonial or cultural activities.**

### **13. Tribal Culture Education Plan**

**This plan should be designed, updated, reevaluated, and administered by members of affected tribes. Tribal members should have priority for any paid positions related to this plan as well as to any paid positions related to the Visitor's Center.**

### **14. Management and Maintenance Plan for Public Access, Recreational Use, and Open Space Areas.**

**b. Restrictions on timing, locations, number of people allowed on all public access features, and group activities for public access and recreation on the site that ensure disturbance to surrounding habitats is minimized.**

**Comment: Specify access plan for tribal members engaging in tribal cultural and ceremonial activities.**

### **15. Open Space and Conservation Deed Restriction or Conservation Easement.**

**Comment: Add to permitted development list: Tribal cultural and ceremonial activities including the planting and gathering of native species by tribal members for cultural and ceremonial purposes. Note: tribal cultural survival is dependent on continuing to have access to tribal homelands and to sustain traditional tribal cultural practices.**

## **IV. FINDINGS AND DECLARATIONS A. PROJECT LOCATION, BACKGROUND, AND DESCRIPTION**

### **Background (page 20 - )**

Many of the lands within the LCWA's planning area are encumbered by legacy oil operations, requiring a phased transition strategy where oil infrastructure is retired or relocated to allow for restoration. (page 20)

**Comment: Additional options to end legacy oil operations on the Los Cerritos Wetlands should be included here to avoid the presumption that current oil drilling operations must be allowed to continue in perpetuity on the Los Cerritos Wetlands and/or that relocation and continuation of oil drilling off the Los Cerritos Wetlands must be permitted in order to restore the Los Cerritos Wetlands. Takings claims are not a legitimate threat when continued oil operations perpetuate the destruction of coastal lands and waters, threaten the health and safety of coastal populations, and exacerbate global warming..**

**Add to this section: The Project site was originally a river estuary, part of the indigenous communities of Puvungna and Motuuchengna. Currently the Project site and the entire Los Cerritos Wetlands lie within the Sacred Site of Puvunga as registered with the CA Native American Heritage Commission. The LCWA has declared the Los Cerritos Wetlands to be Traditional Tribal Cultural Property.**

#### **F. MITIGATION BANKING ENABLING INSTRUMENT (BEI) AMENDMENT (page 25 - )**

**We would point out that mitigation banking always involves allowing polluters to pay rather than prohibiting pollution in the first place. While the sale of mitigation credits will fund expanding salt marsh habitat and providing visitor serving amenities on the Los Cerritos Wetlands, it will also have negative environmental and environmental justice consequences elsewhere. Rather than assume that more pollution is the solution, we ask to what extent past and present property owners and oil operators should be held financially responsible for damages that they caused to the Project Area. We also propose that funding for the Los Cerritos Wetlands Restoration comes from public and private sources that do not themselves pollute or commit environmental injustices.**

#### **D. OTHER AGENCY REVIEW AND COORDINATION**

##### **Tribal Governments (page 32)**

**We ask that any and all tribes impacted by this Project be able to engage in Tribal Consultation throughout the life of the Project. We further ask that all parties to this CDP be amenable to Landback and tribal co-management strategies for this and other portions of the Los Cerritos Wetlands.**

##### **Project Impacts (page 33- )**

**Specifically, the following restoration elements will impact Coastal Act wetlands: (page 34)**

**Comment: This wording should be revised to state that the project will also impact a Tribal Sacred Site and tribal cultural resources**

## **ALTERNATIVES**

**Comment: We find that additional alternatives exist to those proposed by Staff, including restoration of the Project Site that does not involve dredging, excavating, or building berms. The assumption that full tidal influence and the creation of a primarily salt marsh habitat is preferable to enhancing a viable, although degraded, seasonal wetlands ecosystem is both false and costly. Erase and replace restoration projects are far less likely to succeed than ones that build on existing wetlands environments. They are also more likely to result in harm to wetlands and marine species dependent on existing habitat areas. This loss harms our entire coastal ecosystem. Additionally, this CDP makes no effort to ensure that local tribal peoples will have access to the project site for cultural and ceremonial purposes, nor does it entertain the option to return any lands or waters to tribal entities nor to co-manage this site with tribal entities. Therefore, this CDP maintains a Eurocentric and racist approach to the management of public lands.**

### **J. CULTURAL AND TRIBAL RESOURCES (page 53 - )**

#### **Cultural History of the Los Cerritos Wetlands**

There is extensive evidence that the entire Los Cerritos Wetlands area is sensitive for paleontological, archeological and tribal resources, potentially including Sacred Lands, Tribal Cultural Landscapes and Traditional Cultural Property, designated as Native American resources by the Native American Heritage Commission (NAHC). (page 53)

**Comment: Eliminate the word “potentially” with reference to Tribal Cultural Landscapes and Traditional**

**Cultural Property as it is inaccurate. Multiple tribes and two state agencies, the NAHC and the LCWA, have designated this project area as such.** According to the City of Long Beach’s EIR for the Phase1 project, archeological evidence from the Channel Islands indicates that the first people migrated down the California Coast as early as 12,000 years ago. Nomadic groups gave way to more permanent settlements between 8,000 and 3,000 years ago. The Late Period, stretching from 1000 years before present to approximately 1542 A.D., saw inhabitation of the land that now comprises Los Angeles County and Northern Orange County by the Tongva people, who would also become known as the Gabrieleno people after the Spanish colonization of California. The Gabrieleno-Tongva peoples settled in approximately fifty major villages spread out among the prairie and coastal areas. The largest settlements could hold several hundred people, but most villages supported fifty to one-hundred and fifty people. The Gabrieleno-Tongva people were hunter gatherers who used the local 53 9-25-0458 (Los Cerritos Wetlands, LLC)

wetlands, rivers and streams to hunt and fish, to gather reeds and willows to build homes and to provide a reliable water source. (page 53/54)

**Comment: Limiting the historic narrative to archaeological evidence and outdated and suspect narratives by archaeologists is racist. This section should focus instead on contemporary and traditional indigenous voices regarding their own tribal history.**

Approximately 2 miles from the project site, on land now occupied by California State University Long Beach, Rancho Los Alamitos Historic Ranch and Gardens, a veteran's hospital and a private residential community, is an important village site of the Gabrieleno-Tongva people called Povuu'ngna or Puvungna. (page 54)

**Comment: Historically, Puvungna is known to have been occupied for more than 10,000 years and to have extended across the Los Cerritos Wetlands and beyond. It is incorrect and totally illogical to describe it as a village site limited to the current boundaries of CSULB two miles from the Project site.**

#### **Potential Impacts associated with the Proposed Project**

no specific known resources are present on the project site. (Page 55)

**Comment: From a traditional tribal/indigenous perspective, Tribal Cultural Resources are not limited to human remains or human made objects but include all relations, plant, animal, and other. Evidence of tribal cultural resources on the project site would therefore include the ancient salt marsh, indigenous plants and marine life and wildlife, regardless of size or species.**