

Subject: Request for Public Trust Analysis on Long Beach Tidelands

Dear Members of the California State Lands Commission,

As a Long Beach taxpayer committed to the responsible stewardship of public trust resources, I urge the Commission to take immediate action to safeguard our coastal environment. Specifically, I request that the Commission direct a public trust analysis be completed, consistent with *Baykeeper v. State Lands Commission* (2015), and revise the revenue split to meet current needs.

Since 2004, the State has taken nearly \$6 billion from oil production in Long Beach's tidelands under Chapter 138 of the Statutes of 1964, which deemed it "economically impractical, unwise, and unnecessary" to dedicate all locally produced oil revenue to Long Beach. Under the 1991 Optimized Water Program Agreement, the City now receives just 8.5% of oil revenue generated in Long Beach. With revenues declining, this allocation is no longer sufficient to maintain and restore a coastline degraded by a century of industrialization that directly benefited the State.

Today, the City faces a projected \$300 million shortfall in oil revenue intended for coastal care, while Long Beach's tidelands carry over \$1 billion in unfunded coastal infrastructure needs. Conditions have shifted dramatically, mainly as a direct result of State decisions made without adequately assessing their impacts on Long Beach's tidelands, including:

- The California Geologic Energy Management Division (CalGEM)'s Water Injection Schedule, an agency-led effort affecting public trust resources and subsidence control.
- Senate Bill 1137, which eliminated wells in Health Hazard Zones, limited maintenance activities of existing wells, and reduced future revenue to cover certain abandonment liabilities

While the State Lands Commission and the City of Long Beach acknowledged many of these changes in the State Lands-approved Long Beach Unit Program Plan, no accompanying Public Trust Analysis was conducted. The State has a continuing duty to evaluate impacts whenever changing conditions threaten public trust uses, as we are now seeing in Long Beach.

Thank you,