



May 25, 2026

Comments submitted via email to: sustainability@costamesaca.gov

City of Costa Mesa
Economic and Development Services Department
77 Fair Drive 2nd Floor
Costa Mesa, CA 92626

RE: Comments on City's Draft Climate Action and Adaptation Plan Policies

Dear Economic and Development Services Department,

Coastal Corridor Alliance (CCA) respectfully submits these comments on the City of Costa Mesa's draft Climate Action and Adaptation Plan (CAAP). We request to be notified of any and all future comment opportunities on the CAAP or its elements. Please add: Admin@CoastalCorridor.org to the distribution list.

Background

CCA, formerly the Banning Ranch Conservancy, led the decades-long effort to protect and create a permanent public open space of the 400-acre Banning Ranch property located between the borders of Costa Mesa, Newport Beach, and Huntington Beach, along the tidal influx zone of the Santa Ana River. Escrow closed in December 2022, permanently protecting 387 acres of Banning Ranch. The title was transferred to the Mountains Recreation and Conservation Authority (MRCA), a local joint powers authority that manages over 85,000 acres of parkland in Southern California. The property is now known as the Frank and Joan Randall Preserve/Genga (or simply Randall Preserve/Genga).

Our vision of conservation extends beyond the Randall Preserve/Genga to encompass the entire Coastal Corridor from the Pacific Ocean up the Santa Ana River to Adams Street in Costa Mesa. We seek to restore our natural lands, ensure functional habitat for wildlife, and promote the critical need for native biodiversity survival through education and built-environment reform in today's context of late-stage ecological destruction.

Comments

General Comments

We would like to see climate and sustainability planning in Costa Mesa, or any location, first inventory and prioritize the needs of the preexisting and preeminent local native ecosystems. Local, regional, and global ecosystems serve as Earth's irreplaceable, self-regulating life-support systems.

Climate change, environmental injustice, and resource collapses are not just emissions, pollution, and human resource efficiency problems—they are symptoms of a deeper root cause: the destruction of native biodiversity by the expanding built human environment. Climate science points to the biodiversity crisis at the center, and prioritizes restoration over innovation (**Attachment 1**).

While decarbonizing Costa Mesa should be a goal the City strives for in this CAAP, our primary and most effective focus would be to shift our relationship with nature and cede land and resources back to local, regional, and global native living systems. Engineering, technology, and green planning cannot effectively reduce human impacts to accommodate all of what modern human populations want and need, *and* effectively replicate or replace the natural systems that regulate our air, water, and carbon cycles.

Global, Regional, Local: To make our local air, water, and soil cleaner is crucial. But for as long as our populations require remote resources for support, we simply push our air, water, and soil impacts elsewhere. This is just another form of (out of sight and out of mind) environmental injustice for humans, and reinforces the ecological destruction that drives the global climate crisis that local CAAPs try to address. Those global impacts come back around at larger scales to affect all local places too, even if local areas end up with cleaner resources. Climate action in this frame looks like taking responsibility for all of our local and remote impacts, reducing or ending our reliance on remote water, air, mineral, and food resources, and reorienting our local infill spaces for food, sustainable goods production, and native biodiversity recovery.

Climate action based on ecology prioritizes the restoration of all of our suitable natural areas to native habitats, and creating/ceding massive amounts of local, regional, and global space back for wildlife and habitat connectivity.

We hope our comments encourage Costa Mesa's CAAP toward actions that help recover biodiversity as a first and most effective priority.

Prioritized Comments

Our comments on the 2026 Draft CAAP below are grouped by Plan Sector, with Sectors ordered by priority related to our comments. Each comment is referenced by Plan Sector, Location (PDF page), Plan Objective, Plan Action, and CCA's comment.

Sector: Natural and Urban Lands

Location: Pg. 9

Comments: We respectfully request that this Sector gets careful and robust reframing. Natural and Urban lands are very different, which should warrant separate Sectors. The existing action items apply almost exclusively to Urban Lands and their orientation for human benefits rather than prioritizing Natural Lands and (local, native) nature-based solutions.

- **We request Natural Lands become a new, banner 'Sector' of the CAAP plan** focusing on clearly defined, legally bound native biodiversity goals. Actions should support ecosystem recovery on Natural Lands, as this is our best and most effective action to take to mitigate anthropogenic climate change.
 - We request, Costa Mesa add specific restoration and rewilding goals, actions, and ordinances as the European Union does, that remove invasive plants, restore already-available open spaces to functioning locally native habitats, and remove human infrastructure that blocks otherwise available native habitats.
 - Please include consideration of Costa Mesa's position within our bioregion and within the California Floristic Province, acknowledging our City's impact on the fragmentation of native habitats, and its effects on the climate and livability of our built world, as Santa Barbara does in its CAAP.
 - Other documents for reference:
 - CAAPS from San Diego, Santa Cruz
 - Costa Mesa General Plan, Conservation Element
 - Fairview Park Master Plan's California Environmental Quality Act (CEQA) Initial Study/Mitigated Negative Declaration Appendices B-1 and C-3.
- **Urban Lands (Existing Sector):**
 - Native or edible plants: We request all rules, references, outreach, educational or community programs related to the use of plants (Plan-wide) including tree canopies, tree planting, tree replacements, urban greening, shade plants, drought tolerant plants, or landscaping, make a clear prioritization for either locally native plants or edible cultivars for local food production. Please clearly deprioritize or ban planting non-native or non-edible plants in CAAP actions and policies, as they contribute to biodiversity loss. Instead, please share the benefits of locally native plant species and local food production as solutions.

Native plants provide drought tolerance, shade / canopy, sequestration, and more, while also supporting native pollinators, wildlife, natural soil composition, natural water treatment for the watershed (except for Action d., see Water and Wastewater comment).

- Consider adding an action to include public promotion and incentives for residents and developments to participate either in 'homegrown national park' native landscapes (<https://homegrownnationalpark.org/>) (CCA would be glad to help strategize), or micro-farmed food production for locals.
- We support all initiatives that incentivize and expand local food production within infill spaces. Please specify that no additional natural lands encroachments should occur for the sake of food production. We have some other incentivized ideas that support job creation that we can share upon request.
- All civic tree installations or replacements must be to native trees or food production. See Pasadena's urban forestry information: <https://www.cityofpasadena.net/public-works/urban-forestry/>
- Consider policies to block the sale of known invasive plant species from nurseries, garden centers, and more. Look to California Native Plant Society (CNPS), California Invasive Plant Council (CAL-IPC), and Ron Vanderhoff at Roger's Gardens for consultation (rvanderhoff@sbcglobal.net).
- Please define 'Urban Greening' to include recovery for locally native species, Dark Sky, bird safe windows, invasive honeybee and other invasive pollinator management, and more.

Sector: Water and Wastewater

Location: Pg. 6

Comment: We hope this Sector gets a more robust nature-first framework. Local watersheds and dependent native ecosystems must be primary considerations, as they comprise the foundation of all human and nonhuman life of a place.

- We request that all references, examples, and methods related to the use of plants for shade, drought tolerance, or any other benefits be focused exclusively on diverse locally native plant palettes, or cultivars that provide local human food production. We ask the City to commit to working with consultants from groups such as the CNPS, CAL-IPC, and others to create native wildlife friendly landscapes. Ornamental plant palettes support invasive pollinators and other non-native species, whose presence displaces and competes with native biodiversity.
- Local watersheds are engineered to cut off dependent ecosystems through hardened walls and barriers, which would need to be prioritized for removal to recover biodiversity. Please consider forming a framework for long term watershed infrastructure removal.
- Add an action item focused on low-impact development (LID) that mimics natural hydrology. Ensure stormwater capture basins, bioswales, and daylighted drainage systems are designed as

living wetlands rather than concrete or synthetic retention cells. This filters urban runoff naturally before it reaches the ocean while providing immediate avian and amphibian habitats.

Sector: People and Community

Location: Pg. 10 - 11

Comment: We generally support the action items, with a few critiques listed below. We urge the City:

- To prioritize implementing long term solutions like native habitat and watershed restoration that decrease the needs for short term solutions.
- Not to promote 'Green' jobs or businesses that might trade local immediate improvements for global or long term impacts.
- Prioritize sustainably sourced natural materials in efforts to provide relief, and avoid plastics which harm native ecosystems' ability to thrive and regulate the planetary temperatures.

Sector: People and Community

Location: Pg. 11

Objective: PC3: Build City and Regional Capacity for CAAP Implementation

Action: "d. Coordinate with the following agencies on dam operational planning and related flood risks:

- U.S. Army Corps of Engineers Los Angeles District
- Irvine Ranch Water District
- County of Orange"

Comment: Our watersheds are highly engineered, which cuts off their natural functions to support the ecosystems' environmental regulatory systems. Watershed infrastructure might protect human homes from floods, but they accelerate the trajectory toward a warming environment. Watershed infrastructure must be removed, not added for short term climate relief. City policies should reflect this priority, and City involvement in regional planning should promote this practice. Instead of cutting off river and tide functions to protect infrastructure, infrastructure should move out of the way of rivers and tides

(Attachment 2).

Sector: People and Community

Location: Pg. 11

Objective: PC4. Foster Local Sustainable Practices

Action: "e. Engage local Non-Governmental Organizations (NGOs) and compile a list relative to their interests and capabilities on a variety of topics related to climate action and adaptation, such as distributing related news or grant opportunities, or participating in or facilitating volunteer events such as clean ups or tree plantings."

Comment: CCA is available and willing to engage with the City on these topics and activities.

Sector: On-Road Transportation

Location: Pg. 2

Objective: T1. Transition to Electric Vehicles

Comment: We generally support the listed action items. Please add actions to incentivize and plan electrification deployment within a closed-loop second-life framework to reduce rare earth mining impacts. Local improvements should not come with additional global impacts (**Attachment 3**).

Sector: On-Road Transportation

Location: Pg. 2

Objective: T2. Promote Walking and Biking

T3. Reduce Single-Occupancy Vehicle Trips

T4. Increase Public Transportation Use

Comment: We generally support the action items, though not at the expense of more use of plastics or other environmentally harmful materials or activities. We request the City limit materials to sustainably sourced natural materials and focus on design efficiency, biodegradation, and simplification.

Sector: On-Road Transportation

Location: Pg. 2

Objective: T5. Support Smart Growth

Comment: We urge the City to consider how biodiversity is already too constrained, and how continued growth works against climate adaptation.

Sector: Energy and Buildings

Location: Pg. 4

Objective: E1. Reduce Energy Demand in Buildings

Action: "c. Seek grants to offer incentives for cool roofs and walls during roof replacements or renovations."

Comment: Please consider policies / building requirements which include other passive cooling and heating systems of various types (air towers, trombe walls, etc.) for all new construction. Consider hybrid local-earth building materials to reduce resource needs, plastic use, promote in-ground infill building, and more.

Sector: Energy and Buildings

Location: Pg. 4

Objective: E2. Decarbonize Building Energy Use

Comment: We support actions a. - c. However, for d., we recognize that Green Building standards still have major tradeoffs, particularly in the prolific use of plastic and other harmful materials. Consider celebrating those that go beyond Green Building by sustainably sourcing natural building materials.

Sector: Energy and Buildings

Location: Pg. 4

Objective: E3. Increase Carbon-Free Energy Supply

Comment: We provide our general support. Find incentives / ways to keep electrification circular, engage in second-life platforms (See comment above).

Sector: Solid Waste

Location: Pg. 7

Objective: SW1. Reduce Waste Generation

Comment:

- We provide our support for all, with special support for Action b.
- Consider adding actions for easy City-supported e-waste drop-off / recycling, and facilities for handling fats, oils, and grease waste.
- Please consider having City Departments join the OC Trash and Debris Task Force quarterly meetings CCA participates in. Email jesse.aragon@pw.oc.gov to participate.

Sector: Off-Road Equipment

Location: Pg. 8

Objective: OR1. Accelerate Zero-Emission Off-Road Equipment Adoption

Comment: We provide our general support. However, see the above comments on circular electrification and second-life programs to reduce mining impacts.

Sector: Municipal

Location: Pg. 12 - 13

Comment: We can provide our general support for action items, with relevant above comments for other Sectors applied: native-first plantings, second-life electrification, embargo on plastic infrastructure, etc.

Conclusion

We appreciate the City's work on the draft CAAP. Thank you for the opportunity to provide comments on this plan. We understand that ecosystem centrality with its needs and limits have not made its way into widespread public discourse or planning solutions. It's a change in paradigm compared to what most of

us were raised to think and believe about what we humans can or can't sustainably do. We respectfully submit our comments with this in mind.

Should you have questions, please reach out to Paul Waggoner at: (949) 820-9094.

Sincerely,

A handwritten signature in cursive script, appearing to read "Terry M. Welsh".

Terry M. Welsh, MD
Board President

Attachments:

- 1 - UN: Biodiversity - our strongest natural defense against climate change
- 2 - Restoring Free-flowing Rivers in Europe
- 3 - Project Closed Circuit: Helping Cities Lead on EV Battery Circularity