



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Marine Region  
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www.wildlife.ca.gov

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



August 25, 2025

Norman Mundy  
Environmental Supervisor II  
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**LAX TRANSPACIFIC CABLE LANDING PROJECT  
NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT  
SCH #2025071050**

Dear Mr. Mundy:

The California Department of Fish and Wildlife (Department) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the City of Los Angeles (City) for the LAX Transpacific Cable Landing Project (Project), pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that the Department, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**DEPARTMENT ROLE**

The Department is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, section 711.7, subd. (a) & 1802; Pub. Resources Code, section 21070; CEQA Guidelines section 15386, subd. (a).) The Department, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, section 1802.) Similarly for purposes of CEQA, the Department is charged by law to provide, as available, biological expertise during public agency environmental review

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<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources. The Department is also responsible for marine biodiversity protection under the Marine Life Protection Act in coastal marine waters of California, and ensuring fisheries are sustainably managed under the Marine Life Management Act.

## **PROJECT DESCRIPTION SUMMARY**

**Proponent:** Hood 1703, LLC (Applicant)

**Objective:** The objective of the Project is to increase telecommunication pathways and reliability between the United States and Pacific Rim countries by developing subsea fiber optic telecommunications cable landing infrastructure that could receive up to four future submarine cable systems and connect this infrastructure to a terrestrial landing site and terrestrial conduits installed along public rights of way (ROWs) to existing data centers in the region, including the El Segundo area. The Project would include construction at the Dockweiler State Beach landing site, along public ROWs, and offshore to install the following terrestrial and marine components:

- Four transpacific fiber optic subsea cables along the seafloor connecting to four offshore bore pipes. Marine cable routes would be buried at a depth of up to approximately 3.3 feet below the seabed in waters of less than 3,600 feet deep. The cables would lay on the ocean floor in deeper waters.
- Four offshore bore pipes using horizontal directional drilling and extending approximately 4,000 feet offshore.
- Two beach manholes at Dockweiler State Beach at approximately 400 feet landward of the mean high water line to serve as a terminus point for the horizontal directional drilled bores.
- Up to four ocean ground beds at Dockweiler State Beach.
- One horizontal directional drilled bore from one bore manhole to the intersection of Imperial Highway and Vista Del Mar.
- Approximately 4 miles of open trenched terrestrial conduit route in the cities of Los Angeles and El Segundo.

The proposed Project's landing infrastructure, including bore manholes and bore pipes, would occur in one phase, and cable installation would occur in a subsequent phase based on planning timelines, regulatory approval, and installation availability. No subsea cables are currently proposed to be installed or operated as part of the Project's initial construction phase, but the Applicant proposes to evaluate the environmental impacts associated with the subsea cable installation to be comprehensive.

**Location:** The Project's landing site is located within an existing surface parking lot at Dockweiler State Beach in Los Angeles, California (33.9318°, -118.4364°). From the landing site, a subterranean terrestrial conduit system would be installed within public ROWs within the cities of Los Angeles and El Segundo. The Project's fiber optic cables

would cross through Santa Monica Bay and the Pacific Ocean through state and federal waters.

**Timeframe:** The Project's landing site construction is anticipated to occur from April 2026 through February 2027.

## **BIOLOGICAL SIGNIFICANCE**

**Marine Biological Significance:** The marine ecosystems of California's southern coast, commonly referred to as the Southern California Bight, host thousands of species of marine plants, fish, invertebrates, seabirds and shorebirds, turtles, and mammals due to nutrient rich waters and varied topography. The southern coast's marine and coastal habitats include the sandy seafloor, beaches, kelp forests, estuaries, seagrass meadows, mudflats, rocky reef, and open waters. This variety of habitats provide fish and wildlife with nursery grounds, shelter, and areas to forage and reproduce, supporting the region's coastal economy, including numerous commercial and recreational fisheries.

## **COMMENTS AND RECOMMENDATIONS**

The Department offers the comments and recommendations below to assist the City of Los Angeles in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife resources.

### **Unburied Cable in Hard Substrate Communities**

**Comments:** It is the Department's understanding that, at water depths less than 3,600 feet, the cables will be buried in soft-bottom sediments to a depth of 3.3 feet. The Department appreciates that the Project's Initial Study states that the proposed marine footprints would avoid hard-bottom habitat to the maximum extent feasible. However, the Department is concerned that if hard substrate cannot be avoided in certain areas, the cable will be left unburied and lay directly on the ocean bottom, conforming to the seafloor. Placement of the cable directly on the substrate could impact the habitat and its associated biological communities. The impact could worsen if the cable becomes suspended and moves around in these areas, leading to repeated scour of the substrate and any attached organisms. While the cable may be placed to minimize suspension, suspension could still occur due to currents or wave action, especially given the cable's relatively small diameter (less than 2 inches).

Unburied cables can also impact marine life, including important commercial and recreational fish and invertebrate species in the following ways:

- Habitat degradation or altering the physical structure of hard bottom habitats may change habitat structure and minimize areas for shelter, feeding, and reproduction;

- Altered species compositions may occur when cables create new, artificial habitat which could attract some species while potentially displacing others;
- Risk of entanglement of marine life if cables become slack or derelict fishing gear gets caught on them, potentially forming loops and becoming entanglement hazards;
- Physical damage to the cables from fishing operations may potentially injure or kill marine life; and
- Electromagnetic field impacts generated from cables may potentially affect the behavior and navigation of marine species such as sharks, eels, lobsters, and crabs.

Additionally, unburied cables may negatively impact the fishing industry by posing the following risks:

- Entanglement of fishing gear on unburied cables, which can cause damage to fishing gear;
- Potential injuries to fishermen who are attempting to retrieve gear fouled on a cable; and
- Disruptions to fishing operations including ocean trawling and anchoring.

Understanding the potential impacts of unburied cables is crucial for sustainable management and conservation efforts within the fishing industry.

**Recommendations:** The Department recommends that the DEIR provide an analysis of the substrate type, including maps, where the marine Project impacts would occur. To the maximum extent feasible, cables should be laid so that they can be buried in soft-bottom sediments. The Project should minimize the crossing of hard-bottom substrate communities. To minimize potential impacts to hard substrate communities that cannot be avoided by the Project, the Department has the following recommendations:

- Increase the stability of the cable in hard substrate communities to avoid suspension and scour. The Department is aware of multiple methods to accomplish this, such as encasing the cable in a ductile cast iron pipe (articulated pipe) or clamping the cable to the seafloor at regular intervals. The ideal method would depend on substrate type and relief that will vary along the cable route. The Department recommends consulting with resource and permitting agencies to determine the best method.
- In addition, the Department recommends adding a Mitigation Measure for the inspection and burial of the cables, including an annual monitoring and reporting requirement for any unburied sections of cable in depths less than 3,600 feet. This will allow for early detection and remediation of cable suspension and any associated impacts to the substrate, biological communities, and reduction in potential fishing or other gear interactions surrounding the cable.

The DEIR should also include an assessment of the potential impacts to important commercial and recreational fish and invertebrate species in the Project area. This assessment should include potential impacts such as, but not limited to, habitat degradation, altering species composition, physical damage and injury to marine life, and electromagnetic field impacts.

If cables remain unburied, the Department recommends consulting with the fishing industry and cable committees to minimize potential impacts of unburied cables, which include entanglement of fishing gear and disruptions of fishing operations.

### **Active Nearshore Placement Site Impacts**

**Comments:** The Project's Initial Study noted that the horizontal directional drilled alignments would cross through an active nearshore placement site and that the Applicant has been coordinating with the United States Army Corps of Engineers (USACE) regarding this site. The Initial Study or NOP did not include an analysis of potential impacts as a result of the Project's infrastructure crossing through an active nearshore placement site.

**Recommendations:** The Department recommends that the DEIR includes an analysis of impacts that may result from horizontal directional drilled alignments or cables crossing through the active nearshore placement site. In addition to coordinating with USACE, the Department recommends that the City coordinate with the Department, California Environmental Protection Agency, and the Los Angeles Regional Water Quality Control Board.

### **ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, section 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

### **ENVIRONMENTAL DOCUMENT FILING FEES**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by the Department. Payment of the environmental document filing fee is required for the underlying project approval to be operative, vested, and final.

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(Cal. Code Regs, tit. 14, section 753.5; Fish & G. Code, section 711.4; Pub. Resources Code, section 21089.)

## CONCLUSION

The Department appreciates the opportunity to comment on the NOP to assist the City in identifying and mitigating Project impacts on biological resources. Questions regarding this letter or further coordination on marine issues should be directed to Leslie Hart, Environmental Scientist at [R7CEQA@wildlife.ca.gov](mailto:R7CEQA@wildlife.ca.gov).

Sincerely,



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Environmental Program Manager

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