
Los Angeles Regional Water Quality Control Board

August 17, 2026

Renee Moilanen
Director of Environmental Planning
City of Long Beach Harbor Department
Environmental Planning Division
415 West Ocean Boulevard, 7th Floor
Long Beach, CA 90802

Dear Renee Moilanen:

RESPONSE TO NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT & NOTICE OF PUBLIC SCOPING MEETINGS FOR PIER T MARINE TERMINAL REDEVELOPMENT PROJECT

Thank you for the opportunity to comment on City of Long Beach Harbor Department, Environmental Planning Division (Port) 's Notice of Preparation (NOP) for the Environmental Impact Report (EIR) & Notice of Public Scoping Meetings for Pier T Marine Terminal Redevelopment Project (project). As part of this notice NOP, the Port has also prepared an initial study (IS).

The project proposes to redevelop and expand the Pier T Marine Terminal at Berths T-130 through T-140 from approximately 382 acres to approximately 500 acres to reconfigure the terminal, optimize efficient cargo-handling operations, transition to zero-emission equipment, and extend and modernize the existing wharf to accommodate future container volumes and safe navigation of large container vessels. The construction would involve both in-water and landside work. The in-water work includes dredging activities to deepen 24 acres of the eastern portion of the West Basin with the removal of roughly 400,000 cubic yards of sediment; construction of a 1,300 linear feet extension to the existing wharf; improvement of 1,990 linear feet of the existing wharf; upgrades to bollards and fenders along the entire length of the existing wharf; demolition and reconstruction of all or a portion of the existing shoreline; and the installation of 22 new single and double-trolley, electric-powered, rail-mounted ship-to-shore (STS) cranes to replace the 16 existing STS cranes on the wharf.

The goal of the Los Angeles Water Board is to protect beneficial uses within the Los Angeles Region consistent with the Federal Clean Water Act (CWA) and the State of California's Porter-Cologne Water Quality Control Act, which require careful consideration of projects which may result in adverse impacts to water quality and beneficial uses of waters of the State, including hydrogeomorphic changes.

The EIR for this project should characterize all project-specific, cumulative, direct, and indirect impacts on the quality of waters of the state as defined above, and identify alternatives and other mitigation measures to reduce and eliminate such impacts. Analyses should include:

1. Avoidance and Minimization Analysis

DAVID NAHAI, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

The Los Angeles Water Board believes avoidance is the best strategy for managing potential water quality impacts and strongly discourages temporary or permanent impacts to waters of the state when avoidable. When impacts are unavoidable, they should be minimized to the maximum extent possible.

Please present an analysis of alternatives considered to avoid or minimize impacts to waters of the State to the maximum extent possible and demonstrate how the chosen alternative is the Least Environmentally Damaging Practicable Alternative (LEDPA). Note that issuance of a CWA Section 401 Water Quality Certification may be denied should the project not meet this criterion.

2. Impacts to Waters of the State

As noted above, avoidance is the best strategy for managing potential water quality impacts. For unavoidable impacts, understanding how pollution pathways will operate is essential to managing them.

Please:

- a. Specify the causes, natures, and magnitude of all proposed impacts. Provide a level of analyses commensurate with the size and complexity of the project and its potential water quality impacts.
- b. Quantify impacts as definitively as feasible, using appropriate modeling and adequate data. Modeling approaches should be documented; and data deficiencies or other factors affecting the reliability of the results identified and characterized.
- c. Identify whether impacts will be temporary or permanent.

As described in the NOP, approximately 400,000 cubic yards of contaminated sediment will be disposed of from this project. Detailed information about the plans for disposal of this sediment and the chemical and biological testing/procedures to be used should be provided beforehand for clearer understanding of the standards and methods being applied for proper disposal. If disposed within waters of the state, the EIR should analyze the suitability of inshore or offshore sites, the extent of these impacts, as well as the potential to cause and contribute pollutant loading to waters.

In section 3.3.X.a of the IS, the project proponent cites impacts to water and sediment quality through pollutant loading mobilized through storm water and temporarily through resuspension of sediments. The Long Beach Inner Harbor is currently impaired due to copper, DDT (Dichlorodiphenyltrichloroethane), PCBs (Polychlorinated biphenyls), toxicity, silver, benthic community effects, DDD (Dichlorodiphenyldichloroethane), and DDE (Dichlorodiphenyldichloroethylene) in sediment and/or water. Dredging or structural pile removal can release these bound pollutants back into the water column, and migration of that sediment offsite may also contribute to loading in the greater San Pedro Bay as well as other impaired waters including the Los Angeles Harbor - Consolidated Slip. Please provide detailed descriptions on how contaminant resuspension will be addressed during/after deconstruction/construction of Pier T Marine Terminal. The EIR should also analyze pollutant loading to other interconnected waterbodies and the cumulative impacts to the habitat and water quality from loading derived from the proposed construction activities.

Land-side expansions in general increase impermeable surfaces, polluted runoff containing oil, grease, trash, and heavy metals entering the harbor. Detailed description of the impact and mitigation on this issue should be provided

Tidal circulation altered by deepening basins or extending wharfs can alter localized water circulation and current patterns. Biological and hydrological impacts affected by alteration of tidal circulation should be discussed.

The project as presented would permanently impact Long Beach Inner Harbor through the redevelopment and expansion of the Pier T Marine Terminal. In section 3.3.IV.b of the IS, the project proponent has not identified eelgrass based on the Biological Surveys of the Los Angeles and Long Beach Harbors conducted between April 2018 and March 2019. However, surveys for eelgrass older than five years may no longer accurately describe current conditions. The Los Angeles Water Board would require a more recent eelgrass survey during the Clean Water Act Section 401 Water Quality Certification permitting process

3. Mitigation

The EIR should propose compensatory mitigation for the significant impacts to water quality and beneficial uses related to the permanent placement of additional structures within waters of the state and associated loss of waters and degradation of ecological habitat. The compensatory mitigation must ensure that there is no net loss of the overall abundance, diversity, and condition of aquatic resources, based on the watershed profile. If impacts to the waters cannot be avoided, please include the proposed mitigation in the EIR. Final compensatory mitigation is subject to approval by the Los Angeles Water Board during the Clean Water Act Section 401 Water Quality Certification permitting process.

Again, thank you for this chance to comment. We welcome the opportunity to work with you and the project proponent to make this project an example of environmental sustainability in California. If we may clarify any of our comments or be of further assistance, please contact Man Voong at (213) 576-6690 or at Man.Voong@waterboards.ca.gov,

Sincerely,



Céline Gallon
Regional Programs Section

cc:

Victoria Tang, Environmental Program Manager
California Department of Fish and Wildlife

Wetlands Regulatory Office
U.S. Environmental Protection Agency, Region 9

Shannon Vaughn, Coastal Program Manager
California Coastal Commission

Office of Land Use and Climate Innovation
State Clearing House