



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

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July 29, 2026

Alyssa Rodriguez
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**PIER T MARINE TERMINAL REDEVELOPMENT PROJECT
NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT AND INITIAL
STUDY
SCH # 2026061282**

Dear Ms. Alyssa Rodriguez:

The California Department of Fish and Wildlife (Department) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) and Initial Study (IS) from the Port of Long Beach (POLB) for the Pier T Marine Terminal Redevelopment Project (Project), pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. 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

¹ 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.

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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 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: Total Terminals International, LLC

Objective: The primary Project objective is 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 Project's in-water construction activities would include the demolition of portions of the existing wharf and replacement of piles; improvements to sections of the existing wharf, bollards, and fenders; a new wharf extension, including dredging to a design depth of -64 feet mean lower low water (MLLW); installation of concrete piles; and dredging of approximately 400,000 cubic yards of sediment to deepen approximately 24 acres of the eastern portion of the West Basin to a design depth of -55 feet MLLW. The Project's land-side improvements would consist of a new truck gate complex, improvements to the on-dock railyard, and installation of utilities.

Location: The proposed Project site is located at the Pier T Marine Terminal at 301 Mediterranean Avenue, Long Beach, CA. The Project would also include portions of Pier T Echo, Pier S, the Navy Mole, and the West Basin in the Terminal Island Planning District (District 4) of the Long Beach Harbor District in Los Angeles County.

Timeframe: Construction activities would occur in phases over an estimated period of 17 years concurrent with terminal operations. The Project's anticipated construction start date was not included in the NOP.

BIOLOGICAL SIGNIFICANCE

POLB waters support resident and migratory fish and special-status wildlife including marine mammals and seabirds, contributing to the ecological productivity of the San Pedro Bay. Important marine plants and algae such as eelgrass (*Zostera marina*) and canopy kelp (*Macrocystis pyrifera*) support those fish and wildlife species and are common throughout shallow areas of POLB. Eelgrass is important as fish nursery habitat throughout POLB and supports juvenile and adult fish.

The Department designates certain species as California Species of Special Concern (SSC) due to declining population levels, limited ranges, and/or continuing threats that have made them vulnerable

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to extinction. Species that occur in the Project area and are protected under the California Endangered Species Act (CESA), Federal Endangered Species Act (ESA), Marine Mammal Protection Act (MMPA), or designated as SSC include:

- California sea lion (*Zalophus californianus*), MMPA;
- Harbor seal (*Phoca vitulina*), MMPA;
- Green sea turtle (*Chelonia mydas*), Federally Threatened.

Important recreational and commercial species are also frequently caught near POLB waters including California halibut (*Paralichthys californicus*), Pacific sardine (*Sardinops sagax*), and Northern anchovy (*Engraulis mordax*), which is an important forage fish.

COMMENTS AND RECOMMENDATIONS

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

Pile Driving and Sound Criteria

Comments: Underwater noise associated with pile driving and pulling activities may cause temporary or permanent impacts on fish, such as temporary movement out of the Project area, barotrauma injury, or mortality. The Department relies on guidance from the Fisheries Hydroacoustic Working Group to set safe sound pressure level (SPL) criteria for pile driving and pulling activities (Fisheries Hydroacoustic Working Group 2008, Attachment 1). The SPL dual criteria include a peak level of 206 dB and a cumulative sound exposure level (SEL) of 187 dB for fish 2 grams and heavier or a cumulative SEL of 183 dB for fish less than 2 grams. Additionally, if jetting or an impact hammer is used for pile driving, this may also impact water quality, releasing contaminants from sediments into the water and/or creating turbidity that could harm fish.

Recommendations: The Department recommends using a vibratory hammer for pile driving to the greatest extent feasible, or an alternative technology that produces the least amount of noise. If an impact hammer must be used (e.g., due to pile material or refusal at bedrock), multiple minimization measures should be used to reduce sound levels. The Department recommends the following as mitigation measures in the DEIR:

- A sound attenuation and monitoring plan should be submitted to the resource agencies for review prior to initiating pile driving activities;
- Wood, or similar material, cushion block should be used between the pile and hammer during all pile driving using an impact hammer;

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- A bubble curtain should be used, where feasible, during all impact pile driving to further reduce sound below levels that have been shown to cause injury and/or mortality to fish and marine mammals; and
- Underwater sound level monitoring should be conducted during pile driving. If SPLs and SELs exceed agreed upon levels as per the Interim Criteria for Injury to Fish, additional steps should be taken, including reaching out to the regulatory agencies in the Fisheries Hydroacoustic Working Group (Attachment 1), to reduce the underwater noise to acceptable levels.

To address potential water quality impacts that may occur from pile driving that could harm sensitive species and/or habitats, the Department recommends including the use of a silt curtain when feasible as a mitigation measure in the DEIR to control turbidity during high turbidity generating activities. Additionally, high turbidity generating activities should be conducted when there are no strong outgoing tides since this could exacerbate turbid conditions and negatively impact marine life.

Marine Mammal and Sea Turtle Monitoring

Comments: Harbor seals (*Phoca vitulina*), California sea lions (*Zalophus californianus*), and sea turtles (e.g., green sea turtles (*Chelonia mydas*)), may be present or occur within the Project area. Construction activities such as pile driving, dredging, and vessel transits within the Project area have the potential to impact these animals if they are present.

Recommendations: The Department recommends that POLB prepare and implement a marine mammal and sea turtle monitoring plan that includes, but is not limited to:

- Pre-construction monitoring to update the occurrence and use of the area by marine mammals and turtles;
- Establishment of an underwater exclusion zone as a designated focus area for species protection to allow animals to evacuate the area prior to commencement of construction activities;
- Monitoring of marine mammals and sea turtles by an experienced observer immediately prior to and during all construction activities; and
- Pile driving activities should not occur while marine mammals or sea turtles are present within the exclusion zone.

The Department recommends that POLB consult with the National Marine Fisheries Service (NMFS) regarding the above recommendations and any other necessary avoidance and mitigation measures to reduce impacts to marine mammals and sea turtles.

Invasive Species Impacts

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Comments: Disturbance of the bottom sediments from dredging, pile driving and pulling, and anchoring may redistribute non-native species that compete with native species. This could cause widespread adverse impacts to eelgrass and marine ecology. The invasive alga *Caulerpa taxifolia* is listed as a federal noxious weed under the U.S. Plant Protection Act and while deemed eradicated in 2006 from California is monitored for potential future emergence. Another invasive alga species found recently in Newport Bay and San Diego Bay is *Caulerpa prolifera*, which is also a potential threat to growth and expansion of native eelgrass beds and other native algae. *Caulerpa prolifera* can grow as deep as 50 meters and appears to be more tolerant of low light environments than most other macroalgae. Additionally, since all *Caulerpa* species pose a serious risk in harming native marine life, Fish and Game Code Section 2300 was amended in 2023 so that no person shall sell, possess, import, transport, transfer, release alive in the state, or give away without consideration all species of the genus *Caulerpa*, with the exception of bona fide scientific research upon authorization by the Department.

Recommendations: The Department recommends that POLB include a mitigation measure in the DEIR to conduct pre-construction *Caulerpa spp.* surveys to identify potential existence of invasive *Caulerpa spp.* in accordance with the Caulerpa Control Protocol <https://media.fisheries.noaa.gov/2021-12/caulerpa-control-protocol-v5.pdf> (October 2021). Any sightings of *Caulerpa spp.* should be reported within 24 hours to the Department (Caulerpa@wildlife.ca.gov), and NMFS at 562-980-4037 (nmfs.wcr.caulerpa@noaa.gov).

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

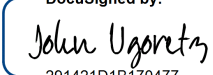
The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by the Department. Payment of the environmental document filing fee is required for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, section 753.5; Fish & G. Code, section 711.4; Pub. Resources Code, section 21089.)

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CONCLUSION

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

Sincerely,

DocuSigned by:

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John Ugoretz for

Craig Shuman, D. Env
Marine Regional Manager

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ATTACHMENT

Attachment 1: Fisheries Hydroacoustic Working Group. 2008. Interim Criteria for Injury of Fish Exposed to Pile Driving Operations: Memorandum. Washington: Federal Highway Administration.