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Matthew Arms
Port of Long Beach, Director of Environmental Planning
cega@polb.com

Lisa Mangione
Senior Project Manager, USACE Los Angeles District Regulatory Division
lisa.mangione@usace.army.mil

Sent via electronic mail

RE: Notice of Preparation of a Draft Environmental Impact Report for the Port of Long Beach Pier Wind Terminal Development Project

Surfrider Foundation ("Surfrider") is a 501(c)(3) non-profit environmental organization dedicated to the protection and enjoyment of the world's ocean, waves, and beaches for all people. In addition to the written comments submitted on behalf of the eNGO Offshore Wind Network coalition members, including Surfrider, we also submit the following comments on behalf of Surfrider's more than 350,000 supporters and members nationwide. Surfrider recognizes that projects that utilize wind as a renewable source of energy can help reduce dependence on fossil fuels and greenhouse gas emissions, and are therefore important for mitigating climate change impacts. However, recognizing that there are many questions and concerns about renewable ocean energy, including potential impacts to ocean recreation, the coastal and ocean environment, public safety, access, and aesthetics, Surfrider takes a cautious, measured approach to offshore wind projects. Surfrider only supports offshore wind projects when there is thorough information, including with respect to potential environmental impacts, and if the projects meet a high bar for environmental and recreational protection. This evaluation applies to potential offshore development, as well as related port development and shore-based infrastructure.

Members of the public may be impacted by the proposed Pier Wind Terminal Development Project ("the project") through diminished recreational opportunities, environmental quality, public safety, and views. Therefore, we recommend the following incorporations into the Notice of Intent/Notice of Preparation to Prepare a Joint Environmental Impact Statement and Environmental Impact Report (EIR/EIS):

- List specific proposed sand dredging locations and alternatives and conduct a detailed analysis of each potential borrow site and the impacts of dredging on those areas.



- Analyze impacts of rock revetment to public trust resources (i.e. potential for beach erosion or lost recreational access), and ensure those impacts are avoided / mitigated
- Describe plans for the terminal beyond the planned staging and integration, and consider potential environmental impacts
- Analyze increased port activity impacts to whales, including input from NOAA and scientific community stakeholders.
- Conduct surveys on the breadth of recreational uses in the vicinity of the project, and consider potential to impact future surf opportunities in the area were the Breakwater to be removed
- Share information about this project with the Bureau of Ocean Energy Management (BOEM) for incorporation into the Programmatic Environmental Impact Statement for Future Floating Wind Energy Development Related to 2023 Leased Areas Offshore California.¹

Environmental Considerations

The project may produce significant environmental impacts to marine and coastal resources in the area. The Initial Study for the Pier Wind Terminal Development Project dated November 2023 and prepared by Aspen Environmental Group (“Initial Study”) states that exact dredging locations would be developed under further technical studies. Surfrider requests that the EIR/EIS list specific proposed locations and alternatives and conduct a detailed analysis of each potential dredging location. Additionally, the Initial Study indicates that between 7 and 10 million cubic yards of sand would be needed to meet engineering requirements, and if sufficient sand cannot be sourced within Long Beach Harbor, then a sand borrow site may need to be identified outside the harbor boundary. If such a large quantity of sand would be needed for this project, then Surfrider requests that the EIR/EIS include details on all potential sand borrow sites, whether inside or outside of the harbor boundary, and that impacts to each site be thoroughly analyzed.

Sand is a finite resource, and such a large quantity of sand removed from the natural environment would undoubtedly have a massive impact on the environment, thus should such a quantity of sand be removed from the natural environment, the impacts to the environment and public trust should be appropriately mitigated. The Initial Study also proposes the construction of a perimeter rock revetment containment dike around the 400-acre terminal. Any rock revetment constructed near or in the ocean should also be thoroughly analyzed for its impacts to public trust resources as well as its impacts appropriately mitigated.

¹ <https://www.federalregister.gov/documents/2023/12/20/2023-27930/notice-of-intent-to-prepare-a-programmatic-environmental-impact-statement-for-future-floating-wind>



The Initial Study concludes that there would be a potentially significant impact to the public or the environment through routine transport, use, or disposal of hazardous materials, and that the topic would be further analyzed in the EIR/EIS. However, the Initial Study was silent with respect to DDT (*dichloro-diphenyl-trichloroethane*) and associated sediment disturbance risks and cleanup efforts. Surfrider requests that as part of the EIR/EIS, *all* environmental impacts be considered, including the project's potential to stir up sediment that may contain traces of toxins from DDT dumping as well as impacts to future environmental cleanup efforts of DDT from the ocean.

Additionally, Surfrider urges the Port to consider the project's impacts beyond the planned staging and integration. We ask that detailed information about the plans for the project's end-of-life be included as part of the EIR/EIS. It would be difficult to support a project without knowing whether the terminal would be used for other purposes after the offshore wind assembly is completed. Thus, as part of the EIR/EIS, we request that sufficient information be provided to explain the terminal's anticipated use beyond the scope of the current project and whether it would be used to support other industrial activities in the area or whether the terminal would be removed at a future date.

Further, thousands of vessels pass through the Port of Long Beach. Blue, Fin, Grey, and Humpback whales are vulnerable to ship strikes, as they are known to migrate long the coast, feeding near the Port of Long Beach². Underwater noise disorients whales, can impact their hearing, and can affect whale migration.³ The ships' presence at the port increases the risks to whales, and additional activity proposed at the port would further exacerbate the problem. Thus, a thorough analysis of the increased impacts to whales from increased activity at the Port should be conducted as part of the EIR/EIS, with input from NOAA and scientific community stakeholders.

Recreational Considerations

The coastline and nearshore waters adjacent to the project site proposed by the Port of Long Beach are regularly used by the public for a variety of activities, including sailing, boating, kite surfing, and paddleboarding, as well as aesthetic enjoyment. This project would have significant impacts to the local community and the visiting public. Ocean recreation and tourism is the largest and most economically significant ocean sector in the United States. Activities such as scenic enjoyment, beachgoing, swimming, surfing, sailing, pleasure boating, diving, bird watching, and wildlife viewing constitute the single largest contribution to our ocean economy,

² <https://www.fisheries.noaa.gov/west-coast/marine-mammals-west-coast-vessel-strikes>

³ <https://www.fisheries.noaa.gov/feature-story/whales-world-sound#:~:text=As%20the%20amount%20of%20ocean,disruption%20and%20impacts%20on%20hearing.>



engaging millions of Americans, and generating more than \$100 billion to our nation's economy each year.⁴ The Initial Study contemplates the construction and operation of the project would preclude boating and recreational fishing, however, the public enjoys much more than boating and fishing in the project area. Surfrider requests that surveys be conducted on recreational uses in the vicinity of the project and that *all* recreational activities that are enjoyed be analyzed for impacts as part of the EIR/EIS, and be appropriately mitigated.

Additionally, while surfing is not a recreational activity *currently* enjoyed in the immediate vicinity of the project, this project has the potential to impact the future of surfing here, and thus must also be considered. Prior to the construction of the Long Beach breakwater in 1949, Long Beach was known for its world class surfing waves⁵. Surfrider's Long Beach chapter members have been involved in ongoing advocacy⁶ seeking reconfiguration of the breakwater in order to improve the natural flow of ocean currents to improve water quality and provide increased recreational opportunities, all of which would provide great ecological and economic benefit to the City. The City and Army Corps of Engineers have conducted studies⁷ to assess the feasibility of potential reconfiguration of the breakwater. Surfrider has a considerable interest in the protection of coastal recreational opportunities that may be affected by this project. Accordingly, decisions regarding the potential siting of offshore renewable energy development must avoid or minimize impacts to recreational uses and associated values. There was no mention of breakwater relocation efforts in the Port's Initial Study. Thus, Surfrider requests that the draft EIR/EIS for the proposed project include analysis of the potential impacts to the breakwater relocation efforts, an analysis of alternative project siting locations, and if impacts cannot be avoided, appropriate mitigation for such impacts.

Additional Considerations

Surfrider appreciates the efforts of the USACE and the Port of Long Beach to develop an EIS/EIR for the Pier Wind Terminal Development Project. Given the terminal's intended purpose of supporting offshore wind development off California, we believe the information should also be shared with BOEM for incorporation into the Programmatic Environmental Impact

⁴ National Ocean Economics Program. Available at: www.oceaneconomics.org

⁵ <https://longbeach.surfrider.org/news/long-beachs-surfing-history-recognized>

⁶ https://longbeach.surfrider.org/break-water?utm_term=&utm_campaign=Google_Search_DSA&utm_source=adwords&utm_medium=ppc&hsa_acc=4530688483&hsa_cam=1621151447&hsa_grp=62268573795&hsa_ad=677150770481&hsa_src=g&hsa_tgt=dsa-19959388920&hsa_kw=&hsa_mt=&hsa_net=adwords&hsa_ver=3&gad_source=1&gclid=CjwKCAiAvoqsBhB9EiwA9XTWGerWt-h08EAlUnRfycxAD6bT-LFmCZrp1laKqQyEqbWJmrhbYFXKihoCMNsQAvD_BwE

⁷ <https://www.longbeach.gov/globalassets/city-manager/media-library/documents/tidelands/ecosystem-study/draft-alternatives-brief>



Statement for Future Floating Wind Energy Development Related to 2023 Leased Areas Offshore California.⁸

Additionally, Surfrider urges the Port of Long Beach to ensure meaningful community engagement throughout the entirety of the public input process. Multiple members of the public attempted to provide comments virtually during the January 10, 2024 meeting, and despite following the instructions from the Port's website, these members of the public were unable to provide crucial testimony. Environmental Justice implications must also be thoroughly considered, and input sought specifically from environmental justice communities, as well as ensuring the public at large has adequate opportunity to provide input throughout this process.

Conclusion

The Surfrider Foundation recognizes that offshore wind technologies may offer important benefits as renewable sources of energy that will reduce emissions of greenhouse gasses to the atmosphere. These alternative energy sources may also provide economic development through a cutting-edge industry for coastal communities. Surfrider acknowledges the growing demand for energy worldwide and that our coasts and ocean may be considered as possible sites for energy generation using alternative, non-polluting technologies. Surfrider strives to support clean, renewable, low-impact sources of energy. We urge the Port of Long Beach to continue to engage with tribal nations, environmental justice communities, public stakeholders, and federal, state, and local government agencies in considering avoidance and mitigation measures in these sensitive areas to help reduce potential conflicts and promote ecosystem health, while best ensuring wind projects are placed in the most suitable areas. This best practice will save time and money, and best ensure balance between development and conservation. We thank you in advance for your consideration of Surfrider's comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Tina Segura".

Tina Segura
Legal Associate, Surfrider Foundation

⁸ <https://www.federalregister.gov/documents/2023/12/20/2023-27930/notice-of-intent-to-prepare-a-programmatic-environmental-impact-statement-for-future-floating-wind>