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Sent via Email to PierTredev@polb.com and Jeniffer.Aleman-Zometa@usace.army.mil

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**Re: International Longshore and Warehouse Union (ILWU), Locals 13, 63, and 94
Public Comment on Initial Study for The Pier T Marine Terminal Redevelopment
Project (SPL-2024-00634-JAZ)**

Dear Ms. Moilanen, Dr. Aleman-Zometa, and Ms. Rodriguez:

International Longshore and Warehouse Union (ILWU), Locals 13, 63, and 94 (ILWU Locals) hereby submit the following public comment on the Initial Study (IS), and on the scope and content of the Environmental Impact Report (EIR) and Environmental Impact Statement (EIS) for the Pier T Marine Terminal Redevelopment Project (Pier T Project).

As you are aware, ILWU Locals collectively represent more than 15,000 Longshore Workers, Marine Clerks, and Foremen at the Ports of Long Beach and Los Angeles, as well as Foremen at the Ports of San Diego and Hueneme. These more than 15,000 members support approximately 60,000 dependents and retirees who rely on the middle-class sustaining jobs provided by the San

Pedro Bay Port Complex (Ports), marine terminal operators, and the ILWU Locals. Uniquely, our membership is also incredibly woven into the fabric of the Ports' surrounding communities, as evidenced by the fact that approximately 53 percent of our members live within five miles of the Ports, and approximately 74 percent of our members live within 10 miles of the Ports. Thus, we provide the following comments not only as the labor force that currently works on Pier T, and would continue to do so once the Pier T Project is completed, but also as residents of the surrounding communities.

These goods-movement union jobs have provided generations of workers with the ability to support their families, purchase homes, and invest in their neighborhoods, including the City of Long Beach (City), and surrounding communities.

As a threshold matter, ILWU Locals are supportive of the Port of Long Beach (POLB)'s vision to more than double cargo volumes from 9.9 million twenty-foot equivalent units (TEUs) in 2025, to 20 million TEUs annually by 2050.¹ We are likewise supportive of the Ports' clean air goals of 100 percent zero-emissions, human-operated cargo handling equipment by 2030, and a 100 percent zero-emissions drayage truck fleet by 2035. These complimentary targets will allow further growth at the Ports to advance while simultaneously improving air quality. With the assumption that the Port of Los Angeles (POLA) has similar goals for growth in mind, ILWU Locals aim to increase our membership from the previously stated 15,000 members, to 30,000 members by 2050. This increase in membership will mirror the Ports' forecasted growth and consequently benefit the local communities, while the Ports' cargo handling footprints continue to expand.

However, the specifics of how POLB is seeking to achieve these outcomes with respect to The Pier T Project, presents numerous problems. Some of these concerns are highlighted below.

Cargo Forecast

The IS for The Pier T Project states, in part, that an objective of the Pier T Project is to, "Increase the cargo-handling capacity and efficiency of the Pier T marine terminal to meet forecasted container volumes and container vessel sizes." (IS, page 2-4; see also, NOI page 7). As mentioned in POLB's July 2026 Fact Sheet - Pier T Marine Terminal Redevelopment Project, this objective is designed to partially achieve POLB's aforementioned 2050 growth target of processing 20 million TEUs annually. It is our understanding a forecast was conducted for the Ports, in 2025, by The Tioga Group, S&P Global/IHS Global, Inc., and Hackett Associates, LLC upon which this projection is based. However, to date, we have not yet had the opportunity to review this study and respectfully request to do so.

The most recently completed San Pedro Bay Cargo Forecast prepared for the Ports that we have reviewed, was drafted in 2007 by The Tioga Group, Inc., Global Insight, Inc., Railroad Industries, Inc., and D.A. Varnado Analytics. In that study, the Base Case Adjusted Forecast, which is meant to represent the most likely container cargo growth path, predicted that by 2025, the Ports would move approximately 48 million TEUs, and, remarkably, 65 million TEUs by

¹ *Building The Port Of The Future*, PORT OF LONG BEACH, <https://polb.com/port-info/projects#building-the-port-of-the-future> (last visited July 12, 2026).

2030.² In light of the fact that the Ports have only recently eclipsed the 20 million TEU mark combined, it is safe to say that forecasts can, and do, fall short of capturing reality.

Therefore, it is particularly alarming that the Pier T Project aims to increase TEU throughput from its current maximum capacity of 3.25 million TEUs (Application for HDP or CEQA Determination, page 12) to “a maximum capacity of 6.1 million TEUs per year,” (IS, page, 2-10; see also, NOI pages 2 and 9) without indicating the sources of these additional TEUs. This begs the question, will these additional TEUs represent new cargo attracted to the Ports, or will they merely be cannibalized TEUs from neighboring marine terminals? The answer to this question, and others, will determine whether the ILWU Locals, and by extension the community, realize the economic and environmental benefits of POLB’s projected growth.

Further, it should be noted that at present, Total Terminals International (TTI), the current tenant of Pier T, holds various cargo throughput records scored by multiple metrics. These records include rail movements per shift, at 10,537 lifts, as well as moves per single vessel call, at 30,744 TEUs. As such, it does not seem prudent to disrupt POLB’s most efficient terminal, while there are other avenues of increasing efficiencies and throughput at POLB.

Additionally, The Pier T Project calls for expanding the footprint of Pier T from 382 acres to 500 acres largely by absorbing, in whole or in part, two neighboring terminals, namely the SA Recycling Terminal, and the Weyerhaeuser Fremont Forest Terminal, in addition to a partial encroachment on to Pier S. Specifically, the “existing 382-acre terminal would expand to approximately 500 acres and would potentially include areas adjacent to the existing marine terminal on Pier T, Pier T Echo, and the Navy Mole, as well as areas north of the existing marine terminal on Pier S and Pier S West (north of Seaside Way and west of Pier S Ave).” (IS, page 2-4). If the Pier T Project moves forward as currently envisioned, will these important marine terminals be relocated or, if their footprint is reduced, be appropriately accommodated, along with consideration given to the jobs that are being displaced? If not, what is to be said about the loss of cargo diversity at POLB? These are matters that a federally designated National Commercial Strategic Seaport must consider.

Proposed Alternatives to Address in the EIR and EIS

As stated in the Notice of Preparation (NOP) of an EIR & Notice of Public Scoping Meetings, “the EIR will describe and evaluate alternatives to the proposed [Pier T] Project that may reduce or avoid any identified significant environmental effects of the proposed [Pier T] Project and identify all feasible mitigation measures to avoid or substantially reduce significant environmental impacts.” (NOP, page 2).

In considering alternatives to the Pier T Project in the EIR and EIS, we urge POLB and the U.S. Army Corps of Engineers (USACE) to additionally consider completing the numerous

² San Pedro Bay Cargo Forecast, THE TIOGA GROUP, INC., GLOBAL INSIGHT, INC., RAILROAD INDUSTRIES, INC., AND D.A. VARNADO ANALYTICS, https://tiogagroup.com/docs/Tioga_Grp_LALB_Cargo_Forecast_exec.pdf (last visited July 14, 2026)

“infrastructure action items” and “digital expansions” already underway or planned, prior to initiating the Pier T Project. These include the following:³

- 1) Pier B On-Dock Rail Support Facility, a \$1.8 billion project, due for completion in 2032, which will triple on-dock rail volume throughout the Ports and cut the time for moving cargo from ship to train from four days to 24 hours.
- 2) Proposed Metro Express Terminal, a 24/7, zero-emissions container terminal that will utilize human-operated, zero-emissions equipment with an annual capacity of 1.8 million TEUs.
- 3) Pier G Slip Fill, a \$365 million project by Pier G operator, International Transportation Service (ITS), in partnership with POLB, to create 19 acres of slip fill as well as a single, continuous 3,400-foot-long wharf which allows for processing many more containers and hosting two of the industry’s largest cargo ships at the same time.
- 4) Deep Draft Navigation Project, a \$318.5 million project, shared by POLB and USACE, to deepen the Long Beach Approach Channel from 76 to 80 feet. Deeper, wider channels throughout POLB allows for safer, more efficient vessel movement and consequently, greater throughput. Construction is scheduled to begin in 2028 and will take three years to complete.
- 5) Leveraging digital connectivity through the CargoNav platform will provide the digital visibility that helps users track shipments, plan operations and maximize efficiency, leading to increased resiliency and performance across the supply chain.
- 6) A Universal Trucking Appointment System will allow motor carriers to schedule appointments to pick up and drop off containers across all six of POLB’s container terminals. This comprehensive appointment system will enhance the velocity and efficiency of drayage transactions.

The IS details that The Pier T Project “would be constructed in seven phases over an estimated period of 17 years.” (IS, page 3-40; see also, NOI pages 1 and 8). Should that estimate be correct, then The Pier T Project does not need to start any earlier than 2033 in order to be completed by 2050. Delaying The Pier T Project until 2033 will allow POLB to realize the growth associated with the above-referenced “infrastructure action items” and “digital expansions,” prior to committing to a project that might be prematurely commenced at Pier T.

An additional alternative to be considered within the EIR and EIS is not expanding into areas adjacent to the existing marine terminal on Pier T, Pier T Echo, as well as areas north of the existing marine terminal on Pier S and Pier S West (north of Seaside Way and west of Pier S Ave). As POLB is well aware, ILWU Locals have shared your enthusiasm about the revolutionary nature of the much anticipated, zero-emissions, fully human-operated project at the Metro Express Terminal on Pier S. The Pier T Project risks jeopardizing the Metro Express Terminal on Pier S, either by shrinking its footprint, or presenting operational, physical, or logistical barriers.

³ *Building The Port Of The Future*, PORT OF LONG BEACH, <https://polb.com/port-info/projects#building-the-port-of-the-future> (last visited July 12, 2026).

A further alternative to consider in the EIR and EIS is the use of human-operated, zero-emissions utility tractor rigs (UTRs) and/or human-operated, zero-emissions straddle carriers, in lieu of the proposed “electric-powered ‘horizontal transport’ equipment to move the containers to the yard stacking crane blocks” from the ship-to-shore cranes. (IS, page 2-10). Also, human-operated, zero-emissions top handlers and/or rubber-tired gantry cranes (RTGs) should be considered as alternatives in the EIR and EIS instead of the proposed electric-powered “yard stacking cranes.” (IS, page 2-10). These modifications allow for “efficient cargo-handling operations, [a] transition to zero-emission equipment,” as well as an accommodation of higher container volumes. (IS, page 2-4; NOP, page 1).

Finally, based on the growing number of battery fires, lithium or otherwise, not only around the Nation and the world, but also within the Ports recently, it causes us grave concern that two battery exchange buildings are being considered as part of the Pier T Project. (See generally, IS pages 2-7 – 2-8). This design appears to mirror the equipment currently utilized at Long Beach Container Terminal (LBCT). Over the past few years, there have been two instances of Automated Guided Vehicles (AGVs) spontaneously igniting into flames at LBCT. It is only due to everyone’s great fortune that the fires did not start in LBCT’s battery exchange buildings. Had that occurred, in such a confined space, where multiple batteries are stored for charging, the consequences would have been devastating and certainly led to not only the extended closure of LBCT, but most likely the Ports. Subsequently, even when such a fire is extinguished, the resultant devastation would impede future operations unless or until the infrastructure can be rebuilt. Conversely, the human-operated, zero-emissions cargo handling equipment discussed above would be charged separately, at a distance apart from one another, and outside, allowing for substantial mitigation of risk.

Energy

The IS states,

“The proposed Project has the potential to result in impacts due to wasteful, inefficient, or unnecessary consumption of energy resources... Operation of the proposed Project would increase on-site electricity use due to the proposed installation and use of zero-emission equipment, such as electric-powered CHE. During the initial phases of construction, cargo-handling operations at the terminal would be largely diesel-powered. However, as subsequent phases are completed, cargo-handling operations would transition to zero-emission... ocean-going vessels calling at the terminal would connect to electrical shore power while at berth... the Project would increase on-site energy use.” (IS, pages 3-15 – 3-16).

This increased energy use is concerning because, in past summers, as a result of rolling blackouts, Governor Newsom was compelled to issue numerous Proclamations of a State of Emergency which lifted the requirement of ships berthed in California ports to use shore power. One such Proclamation of a State of Emergency stated, “it is necessary to take immediate action to reduce the strain on the energy infrastructure, increase energy capacity, and make energy supply more resilient... to protect the health and safety of Californians.”

Further, when a single automated terminal in Long Beach came online, much of the surrounding community was left in the dark, due to the strain on the electrical grid. These experiences have shown us that the electrical grid is far from ready to be counted on for consistent operations at the Ports. This is particularly true as we look toward the upcoming 2030 goal of 100 percent human-operated zero-emissions cargo-handling equipment pursuant to the San Pedro Bay Clean Air Action Plan (CAAP) which will significantly increase power demand. Some estimates predict that the electrical demand of the Ports will increase six times compared to the present.

More recently, there have been numerous power outages within the Ports, with at least seven marine terminals losing power, in whole or in part, including Pier T itself. These losses of power are incredibly disruptive and present a major health and safety risk to equipment operators within the terminals. Certainly, the additional power required by the Pier T Project will place additional strain on the energy grid and impact not only the Ports' operations, but more importantly, the surrounding communities. These communities are also experiencing increased electrification due, in part, to complying with environmental regulations. The combined result of enormous electrical demand, coupled with the lack of additional power generation, have contributed to numerous blackouts this summer, in the middle of a crushing heat wave.

Thus, we strongly urge that the impacts of energy use by the Pier T Project are carefully analyzed in the EIR and EIS.

Funding

The IS does not address the topic of how the Pier T Project will be funded. Thus, ILWU Locals take this opportunity to remind POLB and USACE of the long-standing principle that public funds shall not be used to support automation at California's ports.

Over nearly the past decade, California has consistently included language in State Budgets ensuring that public investments in ports, goods movement, cargo handling equipment, and infrastructure, works to strengthen California's supply chain, while protecting high-quality jobs. This policy has been repeatedly adopted by the Legislature and supported by both the Brown Administration and the Newsom Administration, to ensure taxpayer-funded investments simultaneously improve goods movement efficiency, reduce emissions, and support California's workforce.

In recent years, California has made significant public investments in goods movement and supply chain infrastructure. In 2022, the Newsom Administration and the Legislature approved a \$1.2 billion investment through the Port and Freight Infrastructure Program (PFIP) to strengthen California's ports and freight corridors. In doing so, they approved language prohibiting the allocation of public funds for the purchase of fully automated cargo handling equipment or infrastructure that is used to support fully automated cargo handling equipment. In order to implement that investment, the California State Transportation Agency promulgated guidelines specifying such restrictions. Similar provisions have been included in multiple Budget Acts including in 2017, 2023, 2025, and 2026.

Most recently, in Senate Bill 111, the Budget Act of 2026, the Legislature approved, and Governor Newsom signed into law language stating, funds of the state that are allocated to certain programs “shall not be allocated for the purchase of fully automated cargo handling equipment or for automation supporting improvements or replacements that are used to support fully automated cargo handling equipment.”

This policy has also maintained long standing support on the federal level. As a recent example, the FY 2026 Notice of Funding Opportunity Port Infrastructure Development Program (PIDP) Amendment No. 4 states in part,

“This program will not fund the purchase or installation of fully automated cargo handling equipment remotely operated or monitored, with or without the exercise of human intervention or control, if the Secretary determines that such equipment would result in a net loss of jobs within the port or port terminal. Applicants that propose projects that include the acquisition of eligible cargo handling equipment must indicate in their application whether the equipment is fully automated. If fully automated equipment is proposed to be acquired, the applicant must provide information demonstrating that the project will not directly result in a net loss of jobs.”

Thus, we urge POLB and USACE to adhere to this longstanding principle and not use public monies to fund worker-displacing automation as both the state and federal governments clearly believe that public monies shall not be used to displace workers.

Furthermore, the parent company of TTI is Terminal Investment Limited (TiL). TiL is a joint venture of Mediterranean Shipping Company (MSC), Global Infrastructure Partners (GIP) a part of BlackRock, and Government of Singapore Investment Corporation (GIC), which are all extremely well capitalized and more than capable of bearing the costs associated with the development of this public property.

Average Daily Workforce

As you are aware, POLB “lands are...[managed] by the City of Long Beach in trust for the people of the State of California...The Tidelands Trust gives the [C]ity the right to manage and develop the Harbor District for the sole purposes of **commerce**, navigation, fisheries and recreation.”⁴ Further, POLB is a powerful economic engine that supports the City, the region, the State, and beyond.

The IS asserts “The average daily workforce once the proposed Project is fully completed is expected to be approximately 1,355 workers.” (IS, page 2-10. See also, IS, page 3-38 (stating, “The Project is anticipated to have an average daily workforce of 1,355 workers at Project build-out.”); and IS, page 3-41 (stating, “build-out operations are expected to include approximately 1,355 daily average workers.”)). However, to date, we have not yet had the opportunity to review any report upon which the average daily workforce projection is based, or which categories of workers are included. Thus, we respectfully request the opportunity to review such a report.

⁴ Commission, PORT OF LONG BEACH, <https://polb.com/commission/> (last visited July 14, 2026) (emphasis added)

Further, noticeably absent from the IS is reference to the current average daily workforce at TTI, as it exists today. This is particularly important given that the IS states, “the proposed Project **could generate additional jobs...for...operation.**” (IS, page 3-38, emphasis added).

The NOP states, in part, “Potential Environmental Effects: Potentially significant environmental impacts associated with the proposed Project to the following environmental resource areas would be addressed in the EIR...Socioeconomics...” (NOP, page 2).

Similarly, the USACE Notice of Intent (NOI) to Prepare an EIS states,

“EVALUATION FACTORS: The decision whether to issue a permit will be based on an evaluation of the probable impact including reasonably foreseeable impacts of the proposed activity on the public interest. That decision will reflect the national concern for both protection and utilization of important resources. The benefit, which reasonably may be expected to accrue from the proposal, must be balanced against its reasonably foreseeable detriments. All factors that may be relevant to the proposal will be considered including the cumulative effects thereof. Factors that will be considered include conservation, **economics**, aesthetics, general environmental concerns, wetlands, cultural values, fish and wildlife values, flood hazards, flood [plane] values, land use, navigation, shoreline erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food production and, in general, **the needs and welfare of the people.**” (NOI, page 4, emphasis added).

With such an emphasis on economic impact, it is important that the Pier T Project looks to modernize the terminal while maintaining and growing the number of jobs currently at the site.

Historically, the Ports were home to fishing fleets, canning facilities, and shipyards, in addition to other trades including goods movement. Today, many of these previously referenced industries are extinct or are on the verge of extinction. We understand that in the 1980s to 1990s, fishing fleets employed approximately 1,000 union workers, canning facilities employed approximately 4,000 union workers, Todd Pacific Shipyards, Los Angeles Division employed approximately 5,600 workers, and The Long Beach Naval Station and Naval Shipyard, which occupied Pier T prior to it becoming a container terminal, employed approximately 7,500 workers. Clearly, the local area has already experienced a dramatic decline in employment opportunities, which is at risk of declining even further if the Pier T Project is completed as currently proposed.

As such, the EIR and EIS must include a detailed analysis on the workforce impacts of the Pier T Project, including but not limited to the increase, decrease, or neutrality of the average daily workforce by job classification, and the resultant impact on communities that rely on POLB jobs.

Workforce Impact Report (WIR)

As you may be aware, the City of Los Angeles, in their recent City Charter reform process, decided to allow the citizenry to vote on including a WIR as a part of the POLA leasing process. The WIR is intended to inform the public and decisionmakers about the impacts to employment opportunities on marine terminals undergoing significant redevelopment. This procedural change

is necessary along the same lines that necessitate the completion of the Pier T Project EIR and EIS.

Without documentation detailing the expected impacts of a port redevelopment project, the public and decisionmakers would not be apprised of the workforce impacts of such an undertaking. In past port projects, some terminal operators have incredibly expressed that a project's impacts on employment opportunities were unknown or impossible to predict. Based on the level of sophistication possessed by today's marine terminal operators, ocean carriers, private equity firms, and logistics providers, this level of opaqueness is without credibility.

Over nearly the last decade, the people of the State of California have experienced a devastating affordability crisis due in part to the COVID-19 pandemic, United States trade policies, geopolitical instability, armed conflicts, impacts of climate change, price gouging, and other inflationary pressures. These factors, and others, continue to contribute to a regional homelessness crisis that devastates families, and deteriorates the quality of life for residents of the City, and beyond.

The ILWU Locals are proud to have negotiated middle-class sustaining wages, quality healthcare, and reliable retirement benefits over the course of our nearly 100-year history on the West Coast of the United States and Canada. The Living Wage Calculator for Los Angeles-Long Beach-Anaheim, CA developed by the Massachusetts Institute of Technology (MIT), concluded that a family of four with either one working adult or two working adults, requires \$107,020, and \$146,340 annual income before taxes, respectively, to support their families' basic needs.⁵ This statistic speaks nothing to the quality of healthcare provided at this level of income, nor does it address any provision for workers' retirements, education, or other needs.

Accordingly, the economic impacts of the Pier T Project must be carefully analyzed in the EIR and EIS, preferably through a well-considered, collaborative WIR.

Cybersecurity

ILWU Locals recognize that POLB is a federally designated National Commercial Strategic Seaport. With this designation comes a tremendous responsibility to not only the Nation's economic prosperity, but also, its national security. In a world where nation states, criminal enterprises, and other bad actors are increasingly becoming more capable in the execution of cybercrimes, it is imperative that POLB maintain its ability to remain resilient and flexible in the face of these realities.

Automated equipment without a driver's seat and manual controls are particularly susceptible to incursions from outside of the marine terminal. In the event that a successful cyber-attack was executed, a manual workaround would be impossible, and the consequences would be devastating to the City, the State, and the Country. One of the most important lessons learned during the COVID-19 crisis was that "just-in-time" should not take precedent over "just-in-

⁵ Dr. Amy K. Glasmeier and the Massachusetts Institute of Technology, Living Wage Calculation for Los Angeles-Long Beach-Anaheim, CA <https://livingwage.mit.edu/metros/31080> (last visited on July 14, 2026)

case.” In our opinion, any automation project designed to possibly create a modicum of increased efficiency, at the expense of reliable production, is ill advised.

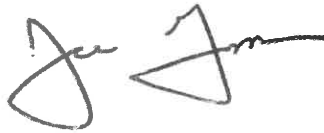
Our opinion is based on previous cybersecurity breaches that have already succeeded numerous times in damaging the national economy. The weaponized Stuxnet virus, Maersk cyber-attack, KRONOS ransomware attack, attacks on the American banking system, and countless others, have shown the vulnerability of digital and/or autonomous operations. Employing workers to operate and control equipment and systems at California’s ports, who possess Transportation Worker Identification Credential (TWIC) cards required by the Maritime Transportation Security Act, and issued by the U.S. Department of Homeland Security, upon the completion of a security threat assessment (background check), provides an additional layer of safety and aids in protecting America and American jobs.

The concerns outlined above are non-comprehensive yet highlight the key concerns we have at this time. We look forward to discussing this matter with Port staff and USACE in more detail.

Sincerely,



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President
ILWU Local 13



Joe Gasperov
President
ILWU Local 63



Daniel G. Miranda
President
ILWU Local 94

cc: Hon. Alex Padilla
Hon. Adam Schiff
Hon. Gavin Newsom
Hon. Robert Garcia
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