RBOC
Protecting your boating Interests.™

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January 23, 2020

Mr. Eduardo De Mesa
Planning Division Chief
U.S. Army Corps of Engineers, Los Angeles District
ATTN: Mr. Naeem Siddiqui 915 Wilshire Boulevard Los Angeles, CA 90017

Chief Mesa:

This is to provide the comments of Recreational Boaters of California [RBOC] regarding the Draft Integrated Feasibility Report and Environmental Impact Statement / Environmental Impact Report pertaining to the East San Pedro Bay Ecosystem Restoration Feasibility Study of the City of Long Beach.

RBOC is the nonprofit advocacy organization that works to protect and enhance the interests of recreational boaters throughout California.

RBOC acknowledges and appreciates the objectives of this project to restore 18 square miles of the East San Pedro Bay from approximately the Port of Long Beach to Alamitos Bay in a manner that restores aquatic ecosystems in a marine environment, and increases abundance and biodiversity of marine populations in East San Pedro Bay.

RBOC is concerned that elements in this project, which include additional rock habitat structure that would support kelp, eelgrass and other sensitive species or habitat types, would have a significant, negative impact on boating.

Specifically and as clearly shown in the attachment, the project would place kelp beds in areas that are very popular for boaters throughout the region. These routes provide for safe navigation and have been extensively utilized for several decades. This will only increase in the future as key boating events are planned in this area that will provide both recreational opportunities and economic benefits for the region.

RBOC therefore requests that:

1. The RBOC organization be included as a stakeholder in any process going forward.
2. The Tentatively Selected Plan (Alternative 4A) be revised to ensure that the negative impacts on recreational boating are eliminated as the project moves forward. The provisions are set forth on P367, Lines 18-21.

Thank you for this opportunity to provide RBOC's comments on this important project. Please feel free to contact RBOC advocate Jerry Desmond, at 916.441.4166, with any questions.

Sincerely,

Daniel J. Hodge

Daniel J. Hodge, President

C: Long Beach Mayor Robert Garcia
Long Beach 3rd District City Councilwoman Suzie Price
Southern California Yachting Association Commodore John Marshall
California Coastal Commission
Long Beach Area Yacht Clubs

Enclosure

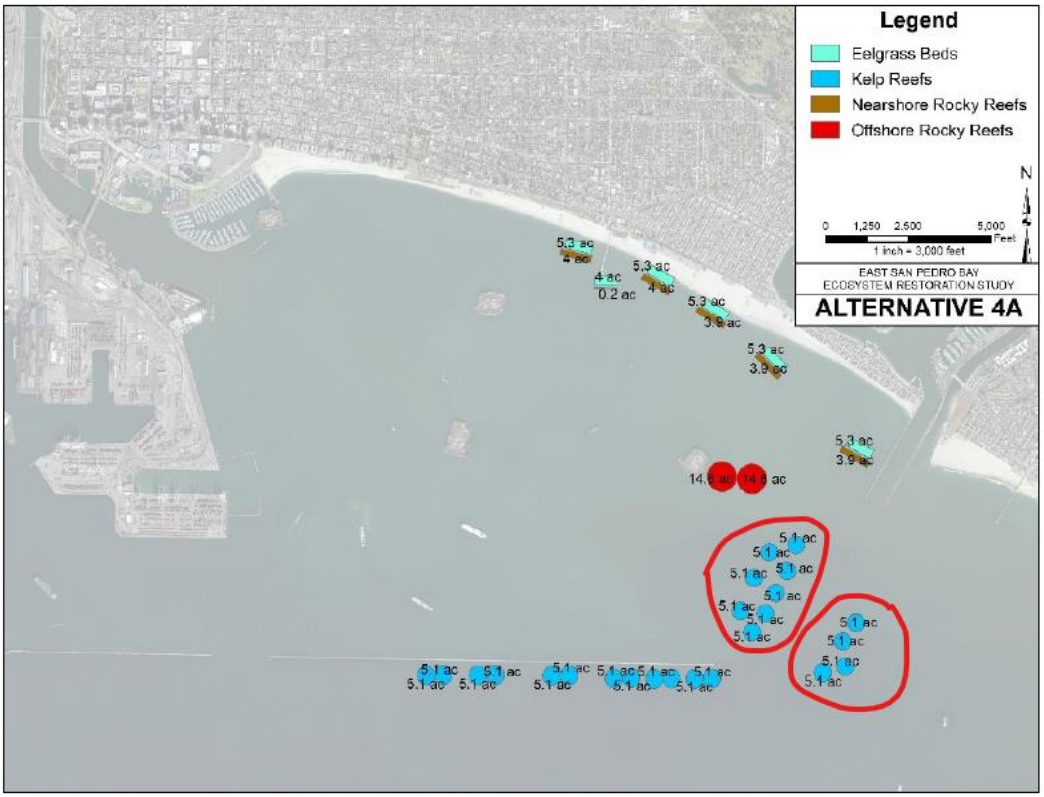

Figure 4-16: Alternative 4A

Kelp Bed Siting and Design Considerations

121 acres of giant kelp beds are restored in the breakwater and open water zones. 60+ acres in twelve, roughly five acre patches would be placed at irregular intervals along the seaward side of the existing breakwater. The kelp beds would be placed along the breakwater, expanding existing kelp forests on the submerged breakwater rock. The undulating edge would break up the linear configuration of existing breakwater rock, creating an "edge effect." This change would increase ecological complexity and value of kelp habitat. Another 60+ acres of kelp habitat in twelve, roughly five acres patches would be restored in the open water, off of the eastern end of the breakwater. This location allows kelp to take advantage of beneficial and nutrient rich cold water currents that giant kelp need to thrive. A recreational boating passageway is shown with the split configuration, which is subject to change.

Each kelp reef will be roughly circular in shape, spanning approximately 500' in diameter, with approximately 20% total bottom coverage of substrate with only one layer of stone thickness. Each five-acre patch of kelp is assumed to be the minimum size based on prior studies approved by National Marine Fisheries Service. A kelp bed with a canopy size of at least five acres would likely persist during extended periods of unfavorable conditions (e.g., El Niño events). Placement of kelp is designed to optimize the optimal conditions kelp need to thrive: cool temperatures, abundant nutrient flows, wave motion and clean waters. Placing kelp beds out beyond the breakwater provides connectivity between breakwater kelp and rocky reef with the nearshore intertidal zone rocky reef and eelgrass shoals. Kelp forests may aide in dispersing short period wave energy to help protect beaches from erosion (Schoenherr, 1992). Wave energy from distantly generated swells will not be effected by the kelp forests.