September 26 2007

U.S. Army Corps of Engineers, Los Angeles District
Regulatory Division
ATTN: Dr. Spencer D. MacNeil
P.O. Box 532711
Los Angeles, CA 90053-2325

Los Angeles Harbor Department
c/o Dr. Ralph G. Appy
425 S. Palos Verdes Street
San Pedro, CA 90731

Subject: Comments of the Northwest San Pedro Neighborhood Council Board to the Berth 136-137 Container Terminal Draft Environmental Impact Statement (EIS) Environmental Impact Report (EIR)

Dear Drs. Appy and MacNeil,

We the elected Board of the Northwest San Pedro Neighborhood Council provided the comments below to the Berth 136-137 Container Terminal Draft Environmental Impact Statement (EIS) Environmental Impact Report (EIR). Given the proximity of the proposed project to Northwest San Pedro, and the Warehouse Distribution Center located east of North Gaffey we have developed the attached comments for your review and consideration.

General Comments

1. There are significant unmitigated air quality, noise, and traffic impacts from the proposed project. Some impacts, especially traffic west of Harbor Boulevard and on Interstate 110, were not even considered.

2. All aspects of the project should meet and exceed the requirements of the San Pedro Bay Clean Air Action Plan, and No Net Increase Policy adopted by the Board of Harbor Commissioners.

3. During implementation of the project construction and operation the Port needs to evaluate air quality, noise and transportation impacts to test the modeling and basis for the mitigations proposed. Should actual air quality, noise, or transportation impacts be greater than estimated in the DEIR/DEIS/DIES then the Port should propose and perform additional mitigations to reduce the impacts to acceptable levels.

Specific Comments - Air Quality

1. **Environmental Impact AQ-1, AQ-2**: **Construction would produce unmitigated emissions that exceed South Coast Air Quality Management District (SCAQMD) emission significance thresholds.**

   The amount of emissions from construction of the proposed project is unacceptable. The Port should explore additional opportunities to lower the pollutant emissions.

   During construction of the proposed project, there will be significant unmitigated emissions of VOCs, NOx, Sox and PM_{10} and $PM_{2.5}$. The listed mitigation measures consist of many items that are related to terminal operations and not construction. More specific air quality mitigations for construction emissions need to be included as part of the DEIR/DEIS/DEIS and future construction specifications. Specifically, all construction equipment: should:

   - Use low sulfur diesel fuel
   - Limit idling times
   - Use diesel particulate filters
   - Evaluate use of electrical or natural gas equipment on-site where feasible.

   In addition, we would expect that specific construction mitigations would be included on all Port projects to achieve no net increase in emissions and possibly a net reduction.

2. **Environmental Impact AQ-3: The proposed project and the project alternatives will result in operational emissions that exceed 10 tons per year of VOCs and SCAQMD thresholds of significance.**

   According to the analysis in the DEIR/DEIS/DIES analysis it will be 2038 before daily and annual impacts for VOCs, NOx and $PM_{10,}$ $PM_{2.5}$ will be reduced to a less than significant impact. We understand that technical challenges exist in reducing air quality impacts. However a 30 year time frame to meet a less than significant impact is too long. The standard that operational emissions should be evaluated against should be the 2001 baseline and SCAQMD thresholds. The Port and COE should evaluate measures that will reduce air quality impacts and emissions over a much shorter time period.

3. **Environmental Impact AQ-17: There should be periodic review and application of new technology and regulations.**

As part the project construction and operation the Port needs to include a post-project validation system that implements new technologies to reduce air quality impacts as soon as possible and take advantage of advances in air pollution control technologies. In addition, a formal review should be done every year to evaluate the state of the emissions control industry and how new technologies and devices could be applied to Port projects.

4. **Table 3.2.1 identifies property damage as one of the adverse impacts of ozone and sulfates generated by the operation of the project, but does not include mitigation for property damage.**

The DEIR/DEIS identifies property damage as one of the impacts from ozone and sulfates but does not specify or estimate the types of property damage nor does it propose a mitigation measure for property damage.

Property damage for air emission could be mitigated by property damage reimbursements. A property damage fund should be established as part of the proposed project construction and operation. A system to evaluate property damage from ozone and sulfates should be initiated as part of the Berth 136 – 147 project to reduce these impacts. This evaluation should make a quantitative assessment as to what extent operations within the Port can damage real property and property values in the surrounding community.

5. **In Section 3.2.4.8.2, the DEIR/DEIS identifies small particle emissions as significant, adverse, and unavoidable.**

There is a difference between having an unavoidable result and an unmitigated impact. If it is true that small particle emissions are unavoidable, these impacts can be mitigated by more aggressive emissions control and mitigations. Among the mitigation that should be considered is by evaluating air quality within home and office spaces in the impacted areas. Based on analysis of the indoor air quality the Port can evaluate the need to supply air purifiers and other improvements for indoor air spaces impacted by small particle emissions from the Port.

6. **We have reviewed the comments prepared by the Air Quality Subcommittee of the Port Community Advisory Committee and support these comments. A copy of that document is included as Attachment A.**

Specific Comments related to Transportation/Circulation

1. **Figure 3.10-2 "Proposed Project Trip Distribution".**

   The project will generate 1.88 million truck trips annually. Of these, 714,400 [38%] will use the 110 Freeway and another 714,400 will use Alameda Street. The impact of these large numbers on freeway congestion has not been evaluated in the DEIR/DEIS.

   A comparison should be done of increase to the existing baseline traffic on the 110 Freeway and on Alameda Street. Further, additional efforts should be made to reroute the increased truck traffic onto the related proposed ACTA Alameda Flyway to see if the predicted 5%-8% truck traffic diversion onto that Flyway can be increased.

2. **The "Related Proposed Project Trip Generation" list is incomplete.**

   The TraPac DEIR/DEIS lists 27 "Related Proposed Project Trip Generation" projects in Table 3.10-2. In a Draft EIR covering roughly the same area, Ponte Vista Development on Western Avenue listed 174 Related Proposed Projects. That list is located at and can be read at http://cityplanning.lacity.org/eir/PonteVista/DEIR/Draft%20EIR%20Sections/IV.J%20Transportation%20and%20Traffic.pdf. Persons who commented on the Ponte Vista DEIR/DEIS identified an additional 26 related projects that should have been included with that DEIR and should be evaluated as part of the Berth 136 -147 DEIR. The list of projects considered by the Ponte Vista DEIR and comments is included as Attachment B.

   The Port should evaluate the impact of all related projects since cumulative impact of the proposed Berth 136 -147 and the overall growth in the area will have a direct impact on congestion traffic in the Harbor Area and Interstate 110.

3. **The DEIR/DEIS does not assess any traffic impacts west of the 110 Freeway.**

   The DEIR/DEIS does not evaluate truck traffic from the proposed project west of the 110 Freeway. Given the location of the Port of Los Angeles Distribution Center on North Gaffey Street at Westmont and the number of trucks that currently use the facility; we believe that the DEIR document does not accurately reflect traffic counts on North Gaffey from Channel

Street to Westmont Street.

Attachment C shows the Port of Los Angeles Distribution Center in relation to the TraPac Terminal (Berths 136 – 147). The Distribution Center Buildings are the light gray west (left) of the 110 Freeway. As can be seen, they occupy approximately as large an area as the Berths 136 - 147 terminal. Truck traffic on N. Gaffey, Channel Street will surely increase with implementation of the proposed project.

As mitigation for the increase, we suggest that the Port evaluate additional on and off ramps to serve the Distribution Center as part of the West Basin Transportation Improvement program.

Specific Comments to Section 3.1 Aesthetics/Visual Resources

1. The addition and expansion of Berth 136 -147 terminal facilities will add to the visual impact of utility poles and additional "cross-arms" on existing poles. This impact should be mitigated by putting all utilities underground along Gibson and Bridges. In addition to under grounding utilities along the boundary of the terminal landscaping should be placed along the perimeter of the facility to reduce the visual impacts. Attachment D depicts an area along Pacific Street with the above ground utilities removed. Under grounding of the utilities along Harry Bridges would mitigate the aesthetic impact of the Berth 136 – 147 project.

2 The number and concentration of cranes within the proposed project area has reduced the aesthetics and visual resources of the surrounding area. This should be mitigated by adopting a crane painting program using a painting scheme designed to blend the cranes into the background. This could be adopted by way of Tariff provision. This is a limited cost item since the cranes have to be painted periodically anyway for maintenance.

3. Knoll Hill should be developed as a public access/buffer area to separate Port industrial uses from residential areas.

These comments have been reviewed and approved by the following members of the Northwest San Pedro Neighborhood Council and residents listed below.

Dan Dixon, President NWSPNC

Diana Nave	Craig Goldfarg	Mary Hamlin
Bonnie Easley	MollieAbatello	Pat Nave
George Thompson	Barbara Schach	John Greenwood
Jody James	Philip Nicolay	

Attachment A

Comments to the Berth 136 – 147 Container DEIR/DEIS from the Air Quality Subcommittee of the Port Community Advisory Committee

September 19, 2007

U.S. Army Corps of Engineers, Los Angeles District
Regulatory Division
ATTN: Dr. Spencer D. MacNeil
P.O. Box 532711
Los Angeles, CA 90053-2325

Los Angeles Harbor Department
c/o Dr. Ralph G. Appy
425 S. Palos Verdes Street
San Pedro, CA 90731

Subject: Comments Submittal for the 2007 Berth 136-147 Container EIR/EIS from the Air Quality Subcommittee of the Port Community Advisory Committee

Dear Dr. Appy and Dr. MacNeil,

We appreciate the opportunity to submit comments regarding the Subject Project Environmental impacts and hereby state our opposition to the Proposed Project due to the current unhealthful conditions in the affected community identified as a Federal non-attainment area for Air Quality, and due to the failures listed in the sections SUMMARY COMMENTS and SPECIFIC COMMENTS, below.

SUMMARY COMMENTS

1. The Mitigation Measures listed for the Proposed Project require revision to, at a minimum, ensure compliance and consistency with all applicable Measures stated in the FINAL 2006 San Pedro Bay Ports Clean Air Action Plan (CAAP) and on the schedule required in the CAAP. As noted in SPECIFIC COMMENTS, several highly crucial CAAP measures are not currently listed for implementation or are scheduled for implementation at dates that undermine the CAAP.

2. We are gravely alarmed that the Port proposed the Project with the statement that the air quality impacts are "considered significant, adverse, and unavoidable" after the proposed mitigation measures have been applied. We have higher expectations that the Port and the City of Los Angeles will demonstrate greater regard for Public Health. We recommend that the Port pursue/require mitigation efforts for the Project beyond compliance with the CAAP and if projected emissions still create residual significant air quality impacts after full application of all feasible mitigation measures, we recommend that mitigation measures be required for existing sources in closest proximity to the Project. The mitigations applicable to sources other than the Project provide the opportunity to reduce the residual emissions to below significant levels on a port-wide basis. Such actions are necessary so that air quality impacts from the Project can be reduced to a level less than significant and so that Overriding Considerations is not invoked on Air Quality.

3. The Proposed Project requires revision to include a legally binding agreement (e.g., lease re-opener clause, specifically stated plan, etc.) with the terminal operator to perform a periodic re-evaluation for the following two actions/purposes:

    a. As the CAAP was adopted with yearly review required, we request that the Project remain consistent with the CAAP and include such periodic review as a lease requirement. Specifically, the CAAP includes the Technology Advancement Program (TAP), which will likely yield technologies or other improvements not currently identified. We recommend that the potential benefit of the TAP be reflected in the Project EIR/EIS by explicitly requiring future adoption of newly proven technologies or operational methodologies which offer improved or increased mitigation as such alternatives become available (e.g., cleaner fuels, add-on equipment, operational changes).

b. For verification that throughput Projections stated in the Final EIR/EIS are not exceeded and, where throughput projections are exceeded, additional mitigation is required.

4. The Mitigation Measures listed for the Construction phase of the Project require revision to implement EPA standards for on-road and off-road vehicles and equipment as noted in SPECIFIC COMMENTS.

5. We request that the emissions for the No Project Alternative be adjusted to reflect the reductions that would result through CAAP implementation to provide a more accurate basis for comparison of the No Project Alternative with the Proposed Project. Currently, the incremental CEQA project impacts are inappropriately calculated in the EIR/EIS by subtracting the current operation's impacts from the increased health impacts associated with the fully-developed Proposed Project. A more accurate depiction of the Proposed Project would define the baseline condition as the No Project alternative with the application of all mitigation strategies (i.e., provide a determination as to how clean the current operation can reasonably be made) and compare the mitigated No Project Alternative to the fully-developed Proposed Project, thereby providing the maximum predicted incremental impact.

6. We request that final approval of the Proposed Project be authorized only after adoption of the San Pedro Bay Standards addressing toxic air contaminants and state/federal criteria air quality standards and after confirmation that the Proposed Project will not violate the adopted Standards. We note that the Board of Harbor Commissioners' November 2006 adoption of the CAAP included commitment to the establishment of such San Pedro Bay Standards through cooperation between the Ports and Regulatory Agencies, expected to be completed in the coming months, and that the authorization of the Proposed Project provides opportunity to demonstrate the Port's commitment to the Clean Air Action Plan and the adherence to cooperatively established Standards. Given that adoption of the standards will occur in the coming months, the Final EIR/EIS can be prepared as a parallel effort and can be modified in a timely fashion to ensure consistency.

SPECIFIC COMMENTS (applicable to referenced CAAP Section)

Executive Summary

The future year numbers for Ship Calls, TEUs, Truck and Rail Trips, as presented in Table ES-1, are based on capacity calculations for berths 136-147. These numbers require verification for correctness and the respective assumptions forming the basis of the calculations must be explicitly stated. In particular, the following issues must be addressed:

- On page 3.10-23, statement is made, "….it is expected that the gate moves would be distributed as follows: 80 percent day shift, 10 percent night shift, and 10 percent hoot shift in 2015; and 60 percent day shift, 20 percent night shift, and 20 percent hoot shift in 2038." The associated total annual throughputs presented in Table ES-1 are projected to be 1,747,500 TEUs in 2015 and 2,389,000 in 2038. In fact, if all three shifts were operated at the day shift levels, the total annual throughputs would be 4,194,000 TEUs in 2015 and 4,300,200 TEUs in 2038 (dayshift level times three), resulting in far greater numbers of ship, rail and truck trips and their respective emissions.

- Annual rail trips appear to be higher than would be calculated using the rail capacity data presented in the draft EIR. This has the effect of underestimating emissions because truck trips (and their higher per TEU emissions) would be under predicted because TEUs not shipped on rail would be shipped by truck.

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As actual annual TEUs, Ship Calls, Truck Trips, and Rail Trips may differ from the Final EIR/EIS projections, we recommend that the lease for the Proposed Project include a requirement for

periodic measurement of actual TEUs/Calls/Trips and where throughput projections are exceeded, additional mitigation is required.

Chapter 3.2: Air Quality

Operational Mitigation Measures

Measure MM AQ-9, Fleet Modernization for On-Road Trucks, requires revision to ensure consistency with the CAAP and the concession-approach Clean Trucks Program announced by the Port on April12, 2007. As shown in the following table, the EIR's currently stated phase-in of USEPA 2007 emission standards applicable to heavy-duty diesel trucks entering Berths 136-147 falls drastically short of the schedule presented in the April 12 Program announcement.

	MM AQ-9	April 12 Clean Trucks Program
Implementation Date	Cumulative Percentage of Trucks Meeting 2007 Stds	Cumulative Percentage of Trucks Meeting 2007 Stds
By January 1, 2008	15%	14%
By January 1, 2009	30%	47%
By January 1, 2010	50%	90%
By January 1, 2011	70%	99%
By January 1, 2012	90%	100%
By January 1, 2013	100%	

Furthermore, the adopting statement by the Board of Harbor Commissioners requires establishment of, "…a program that restricts the operation of trucks that do not meet the clean standards established in the Plan." The Program was further detailed in the April 12 announcement as follows:

- Ban pre-1989 trucks from port service by 1/1/08
- Ban 1989-1993 trucks from port service by 1/1/09
- Ban unretrofitted 1994-1998 trucks from port service by 1/1/10
- Ban unretrofitted 1999-2003 trucks from port service by 1/1/11
- Ban unretrofitted 2004-2006 trucks from port service by 1/1/12

Specific lease provisions should be established that incorporate the ban schedule above.

Measure MM AQ-11, Low Sulfur Fuel (LSF) in Ships, requires revision to ensure consistency with the CAAP. The EIR's currently stated phase-in of LSF (maximum sulfur content of 0.2 percent) in Ocean Going Vessels of 10% in 2009, 20% in 2010, 50% in 2012, and 100% in 2015 fails to satisfy the CAAP milestones applicable to the same LSF measures applicable to OGVs.

The CAAP requires that the Measures OGV3, applicable to Auxiliary Engines, and OGV4, applicable to Propulsion Engines, shall be implemented through lease requirements (as new leases are established or existing leases are revised) and/or through a tariff to be implemented by third quarter 2007. Specifically, OGV3 and OGV4 require that immediately upon lease renewal, all ocean going vessels utilizing the leased facilities must burn $\leq$ 0.2% S MGO within the current VSR program boundary of

20 nm. In the first quarter of 2008, the requirement is expanded to the 40 nm boundary. The schedule in the draft EIR would not require all OGV to comply until seven years after the date established in the CAAP and would result in a severe shortfall in the emission reductions promised in the CAAP.

Furthermore, OGV3 and 4 require the port to continue to evaluate the availability of $\leq$ 0.1% S fuels and possibly change the requirement to the lower limit. Therefore, MM AQ-11 should be revised to require the lease to automatically adjust the sulfur limit to $\leq$ 0.1% when the CAAP is amended to generally require $\leq$ 0.1%.

Measure MM-AQ12, Slide Valves in Ship Main Engines requires revision to ensure consistency with the CAAP. The currently stated phase-in of slide valves in the EIR/EIS applicable to Ocean Going Vessels at 15% in 2008, 25% in 2010, 50% in 2012, and 95% in 2015 fails to satisfy the CAAP milestones applicable to the same slide valve measure applicable to OGVs.

The CAAP requires that the Measure OGV5 shall be implemented through lease requirements as new leases are established or existing leases are revised. Specifically, OGV5 requires that immediately upon lease renewal, all ocean going vessels utilizing the leased facilities must employ slide valve technology. The schedule in the draft EIR would not require all OGVs to comply (a maximum of 95% of ships must comply) and the 95% level is not achieved until seven years after the date established in the CAAP, resulting in a substantial shortfall in the emission reductions promised in the CAAP.
(In comparison, note that the draft EIR/EIS for China Shipping required slide valve technology on 70% of the ships serving the terminal by 2007 and 100% by 2010.)

Measures MM AQ-7 and AQ-8, Yard tractors and all other diesel-powered terminal equipment, as written on page 191of the EIR, appear to basically comply with CAAP measure CHE-1. However, the description of the requirements for yard tractors on page 62 and 66 is silent about existing yard tractors, an apparent typographical error, and should be corrected.

Measure MM AQ-13, New Vessel Builds - Controls Technologies, must be expanded to include specific control requirements of 90% for PM, NOx and SOx and a clear description of how the measure would be enforced by the lease agreement.

Measure MM-AQ14, Clean Rail Yard Standards, while identifying possible “cleanest locomotive technologies,” is vague in describing exactly how the measure will be enforced. Specific language must be included in the lease to require percent reduction requirements or numerical emission standards reflecting the referenced “cleanest” technologies and when they will be achieved.

The Project EIR/EIS currently includes no measures applicable to Harbor Craft, which represent a sizeable percentage of total Port particulate matter pollution. The EIR/EIS requires revision to include mitigation measures consistent with the Clean Air Action Plan Measure HC1 which is to be implemented through lease requirements. Specifically, lease requirements for TraPac should be established which require:

- By 2008, all harbor craft servicing TraPac shall meet the EPA Tier 2 standards for harbor craft;

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- By 2011, all previously re-powered harbor craft servicing TraPac will be retrofitted with the most effective CARB verified NOx and/or PM emissions reduction technologies; and

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- On availability of Tier 3 engines, within five years all harbor craft servicing TraPac will be re-powered with Tier 3 engines.

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Construction Mitigation Measures

Measure MMAQ-2, Fleet modernization for On-Road Trucks, allows for 2007 model year or 1994 model year + CARB Level 3 Particulate filter on-road heavy-duty diesels. Construction emissions from on-road trucks in Phase I (2008-2015) can be substantially reduced by requiring the entire fleet of on-road trucks used for construction and/or to convey material to or from the site to meet the following hierarchy of requirements:

1. Meet the 2010 on-road emission standard for NOx (0.2 g/bhp-hr) and for PM (0.01 g/bhp-hr); or

2. If infeasible (not commercially available) for all on-road trucks used for construction activities to meet the 2010 standard, such trucks shall use LNG (exceeding 2007 on-road standard for NOx and PM).

3. If infeasible (not commercially available) for on-road trucks to use LNG, such trucks shall at least meet the 2007 standard of 1.2 g/bhp-hr for NOx and 0.01 g/bhp-hr for PM.

4. Only if the above approaches are determined to be infeasible (not commercially available), use of 2003 or later model year trucks retrofitted with the highest level of CARB-verified NOx and PM control devices is recommended.

During Phase II (2015-2025), only heavy duty trucks meeting the 2010 standards should be used since the trucks will have already been available for five years.

Measure MMAQ-3, Fleet Modernization for Construction Equipment, requiring Tier 2 on-road emission controls in Phase 1, is not as aggressive (and public-health conscientious) as possible. Emissions from construction equipment in Phase I (2008-2015) can be substantially reduced by requiring the following hierarchy of requirements:

1. Use of on-road engines that meet the 2010 emission standards for NOx and PM.

2. If the use of on-road engines that meet the 2010 standard is infeasible (not commercially available), use of LNG (exceeding 2007 on-road standard for NOx and PM).

3. If LNG is infeasible (not commercially available), use of on-road engines that meet the 2007 emission standards for NOx and PM.

4. If the use of on-road engines that meet the 2007 NOx and PM on-road standards is infeasible (not commercially available), use of off-road engines that meet the EPA Tier 3 off-road emission standard in combination with verified diesel emission controls (VDECs) that will provide the greatest reduction in NOx and PM
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5. Only if the above approaches are determined to be infeasible (not commercially available), then the use off-road engines that meet the EPA Tier 2 standards in combination with the use of emulsified, ultra low sulfur fuel is recommended for all off-road equipment.

Technical Comments

P3.2-3, line 11 – An important component of PM is the photochemical (secondary) formation of PM in ambient air in and downwind of primary Port emissions. This downwind occurrence is unambiguously related (though not wholly attributable) to Port emissions through the release of sulfur, VOCs, PAHs, combustion exhaust, and other

airborne contaminants. Control of sulfur emissions, for example, at the Port, offer dual-edged benefits in air quality, through reductions in direct sulfur dioxide emissions AND reductions in subsequent (downwind) particulate sulfate production. In that sense, ozone is NOT unique as a secondary photochemical pollutant associated with Port operations.

P 3.2-5, lines 6 through 8 – Particulate matter is bi-modal in annual mass maxima, with a slightly higher winter peak than summer. This is understood to be the result of two slightly differing phenomena. Summertime photochemistry accounts for a significant portion of the observed PM (which is produced by secondary particle formation, using the ultraviolet energy of the summer sunlight). During the winter months, low inversions and cooler weather limit atmospheric dispersion and provide conditions conducive to gas-to-particle condensation and phase shifts, resulting in higher PM levels than those directly assignable to primary emissions alone. Therefore, describing wintertime PM as "inert" is inaccurate, misleading, and should be corrected.

P3.2-5, line 13 – Air pollutant monitoring is a means of assessing air quality, NOT a direct method of air quality improvement.

P3.2-14, Table3.2-5 – How is it that Ships are such a relatively small category contributor to total PM (25%) in this listing of 2003 emissions? In contrast, the 2001 port-wide emission inventory identified the contribution of ocean-going vessels to PM10 emissions as 55%.

P3.2-43, line 21 – Why do "unmitigated" emission calculations use 2.7% (27000 ppm) sulfur residual fuel for predictions and presentation, but much cleaner fuels (500 ppm sulfur fuel or 15 ppm sulfur fuel) for other alternative applications? Is the Port implying that ANY cleaning of sulfur from fuels is "mitigation" and that internationally, other fuel sources will remain at 2.7%? This would seem to run counter to recent international observations, SECA areas, and other activities.

P3.2-97, line 24 – The implication here seems to be that the C-R function may not be appropriate for the Port because non-California cities were primarily used in the Krewski et al study cited. If this is a substantive concern on the part of Port staff, a revised analysis, by Jerrett, using data from Southern California only, was performed and found a higher relative risk value than that determined by Krewski et al for the 63 US cities investigated. This issue was discussed in the preparation of the 2007 SCAQMD AQMP, where the decision was made to ignore the specific California value and use the national value.

P3.2-97, line 33 – This sentence is confusingly worded – how can a change in concentration be below the ambient concentration? By definition, the outdoor concentration is the ambient concentration.

Chapter 4 Cumulative Analysis:

P4-32, line 36 - The 2007 SCAQMD AQMP predicts attainment for ozone in 2023/24 (not 2020).

P4-39, line 18 (Section 4.2.2.8, Cumulative Impact AQ-7, Potential conflict with applicable AQMP) – The contribution of emissions from this project will impact the timing and ability of the AQMP to achieve needed reductions for attainment, so how can the conclusion be reached that the impact is "less than cumulatively considerable"? The proposed explanation is that the Port has provided SCAG with cargo forecasts for AQMP development, so the AQMP, by definition, accounts for Project development. This would seem to be circular reasoning, in that the ability of the AQMP to achieve attainment by any given date will be a function of the cumulative emissions and identified control strategies available to offset them, so additional emissions (from additional projects) would seem, by definition, to cumulatively affect the timely and successful implementation of the AQMP.

Appendix D3: Health Risk Assessment

pD3-4, para2 – With respect to diesel-fired external combustion boilers, how is considerations of DPM only (1 chemical) more conservative than consideration of individual TAC emissions (16 chemicals)? Given that "boiler emissions" are later determined to be responsible for almost 40% of the CEQA residential cancer risk, simplifying assignments of this exposure category should be well-documented, supported, and carefully considered.

pD3-7, para2 – The idling time assumption for line-haul locomotives assumes a value of 1 hour, compared to 1.9 hours previously used. Has this idling reduction time (contained in the CARB-Railroad MOU) actually become a part of routine operations (can the reduced idling time be currently verified for operations today)?

pD3-9, Item 2, Terminal Equipment – Increasing average hourly terminal operations by 25% to simulate peak activities seems very low, when peak activities would seemingly multiplicatively increase average operations. On what basis was the 25% assumption value selected?

pD3-9, Item 3, Trucks – If 10% ADT is assigned to each hour from 0600 to 1800m doesn't that make 120% (not to mention the additional 60% from the 5% assignment from 1800 to 0600)? What does it mean to use a value of 180% of the ADT?

pD3-9, Item 4, On-Dock rail-yard – assumption is one hour of activity, but how does this compare with current use(s) and the MOU?

P.D3-20,Table D3-5, Receptor Type – While it may be true that "Students" would "only" be exposed for 6 hours, 180 days at school, their lifetime exposure would be an additive sum of time spent at school (6 hours, presumably) AND at home (18 hours, per the simplifying assumptions used herein). The calculations used in this health risk assessment would therefore seem to systematically under-predict exposure for identified groups (students, recreational, occupational) because the calculations do not seem to account for the total 24hr period for these sub-populations.

P. D3-20, Table D3-5, Exposure Assumptions Notes, #4 – The recreational breathing rate of 3.2 m^3/hr (or 3200 liters per hour, or ~53 liters per minute) does not seem especially conservative for two hours of effort; this is only five times resting ventilation rate. Aerobic exercise (such as running and cycling) can routinely involve exercise at ten times resting ventilation rates for extended periods of time.

Non-Air Quality Comments

Chapter 3.1: Aesthetics

Claim is "no significant changes", but this seems a surprising conclusion given the three-fold expansion of the operations, the re-alignment of Harry Bridges Boulevard (and the resulting recreational area/buffer), the wharf extensions, and the crane replacements.

Chapter 3.9: Noise

Several questions are raised by the presented Noise information including the questions listed below.

1) Measurements made during 2002 are certainly of value, but were possibly made prior to the completion and current level of operations at the China Shipping Terminal. In this regard, the current noise levels may differ from those previously reported because the level of current operations is significantly greater, the area under active use is significantly larger, and the topological surface (berms, working areas, ground

slope and shapes) are potentially substantively different from the physical reality during the measurements of 2002. Are more current measurements available, or can a few spot measurements be made to provide a comparison/adjustment factor to current configurations and intensity of usage?

2) The measurements provided in the Wilmington area appeared to be generally at the terminal fence-line. Was a specific determination made that measurements back at homes and playing fields would be lower and less relevant, or that the topography was sufficiently flat and open such that noise would dissipate in a predictable manner with increasing distance? How do the noise measurement locations fit with the predominant wind trajectories for the area around the proposed terminal?

3) Comparisons are made in On-Site Operations, p.3.9-33, to 1990 measurements for container operations in the Port of Los Angeles, a period when two Evergreen vessels were being unloaded and four gantry cranes were in use. Is this a realistic and appropriate comparison for typical terminal operations noise, seventeen years later, with much more activity, and somewhat different equipment?

Control of removed landfill or sediment

The EIR/EIS requires revision to include specific plans for the control of removed landfill or sediment such that landfill disposed during construction is controlled in a manner that protects Public Health and ensures adequate coverage and handling of disposed toxic material.

We look forward to release of the Final EIR/EIS with incorporation of our recommendations as we seek mutually to benefit from improved air quality.

Richard Havenick
Chair, Air Quality Subcommittee
Port of Los Angeles Community Advisory Committee

Copies to: Dr. Geraldine Knatz, Port of Los Angeles Executive Director; Mr. Henry Hogo, Deputy Executive Officer, South Coast Air Quality Management District; Todd Sterling, California Air Resources Board; Jayme Wilson, Chair, Port Community Advisory Committee; Air Quality Subcommittee Members; Port Community Advisory Committee Members

Attachment B

Table of Proposed Projects included as Comment to the Ponte Vista DEIR

3.10 The list of "other projects" is incomplete. The impacts of the following additional traffic generators should be added to Table IV.J-9, List of Related Projects and the impacts assessed.

-China Shipping Terminal Development, Berth 97-109 to handle 1.5 million TEUs per year requiring a total of **3,720 daily truck trips** and up to 950 annual round trip rail movements.

-TRAPAC Expansion at Berths 136-149, from 176 acres to 251 acres and resulting increase in truck trips

-New L.A. City Fire station at Gaffey and Miraflores

-Greatly expanded L.A. City Harbor Area Police Headquarters, jail, and community room on John S. Gibson Blvd.

-Relocated and greatly expanded Animal Shelter and community room at Gaffey and Miraflores
-Union Pacific ICTF Facility (PCH & Sepulveda/Alameda)

-St. Peters Episcopal Church, currently requesting a zoning variance to operate a child care for 66 infants, toddlers and pre-school children at 1648 W. 9th Street

-The new Henry's Market at Western and Park Western, which replaced a very underutilized market

-Impact of foreign trade zone designation for Port of LA Distribution Center at Gaffey and Westmont

-Two new mausoleums being built at Green Hills Memorial Park

-Starbucks/T-Mobile planned for 422 S. Gaffey

-Additional residential units:

366-74 W. 8th (Sepia Homes)	20 units
327 N. Harbor Blvd, (Sepia)	60 units
407 N. Harbor Blvd, (Sepia)	42 units
1200 S. Beacon St.	140 rental units
Habitat for Humanity	16 units, Santa Cruz/Palos Verdes
Habitat for Humanity	8 homes in Wilmington
534 Eubank	10 units
1160 W. 11th Street	13 attached homes
Union Ice Expansion 901 East E St.	85,000 sq ft
525 E. "E" St.	Truck Parking and Dispatch facility
Potential Industries, 701 E. # St	40,000 sq feet
Electronic Balancing, 600 E. D St	24,000 sq feet
Marymount College student housing	320 students – Palos Verdes Dr. North

Three additional corrections should be made to Table IV .J-9:

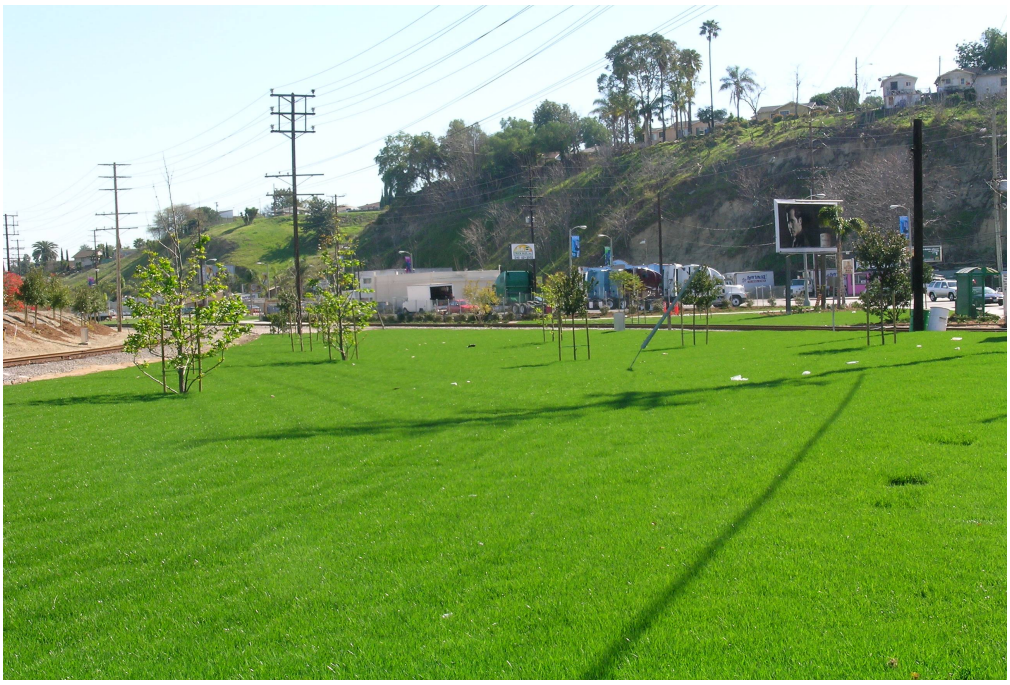
Map No. 16, Rolling Hills Preparatory School should show the projected enrollment of 900 students, 140 faculty, and 62 dwelling units

Bridge to Breakwater listed at 1.1 million square feet – was 3.8 million square feet in the project description (new NOP may modify this);

Two new cruise ship berths and several new parking structures have since been proposed and should be included.

Attachment D

Photograph Looking North along Pacific Street



Same Picture with Above Ground Utilities Removed

Photograph Looking North along Pacific Street

Same Picture with Above Ground Utilities Removed

Related Projects

Related projects are development projects that have been proposed, applied for, approved, and/or are under construction. Related projects were identified based on information on file at the City of Los Angeles Departments of Planning and Transportation, City Rancho Palos Verdes, City of Rolling Hills Estates, City of Carson, City of Long Beach, City of Torrance, City of Lomita, and the County of Los Angeles. Related projects were also identified through public comments received during NOP and scoping process for this Draft EIR. The list of related projects in the Project study area is presented in Table IV.J-9. The location of the related projects is shown in Figure IV.J-12. The previously noted Mary Star High School project is identified as a related project, although its traffic impacts are considered in conjunction with those of the Project for mitigation purposes as discussed below.

Table IV.J-9
List of Related Projects

Map No.	Project/Case/ Tract No.	Applicant/Location/ Project Description	Land Use	Size	Status
City of Los Angeles[1]					
1	EAF 1998-0306	734 Wilmington Blvd.	Mixed-Use – Food/Retail	7,180 sf	Proposed
2	EAF 1998-0322	Mt. Sinai Missionary Baptist Church 225 Mesa St.	Demolish Existing Church School	(10,700 sf) 10,000 sf 4,000 sf	Proposed
3	EAF 1999-0100	Walgreens Drugstore 24930 Western Ave.	Commercial	13,904 sf	Proposed
4	EAF 1999-0143	Terragona Plaza 1000 Western Ave.	Addition to Ralphs Addition to Ralphs	15,000 sf 8,960 sf	Proposed
5	EAF 1999-0229	305 Anaheim St.	Gas Station Convenience Market	12 fuel station 1,200 sf	Proposed
6	N/A	West Channel/Cabrillo Marina Phase II Miner St. and 22nd St.	Land Development	47 acres	Proposed
7	EAF 1999-0366	900 Anaheim St.	Restaurant	6,600 sf	Proposed
8	EAF 2000-0844	311 Gaffey St.	Gas Station Mini Mart	6 fuel station 1,390 sf	Proposed
9	EAF 2000-3161	Normandie Ave./Torrance Blvd.	Single-Family	63 DU	Proposed
10	EAF 2002-7390	303 Gaffey St.	Existing Restaurant Additions	3,000 sf 1,816 sf	Proposed
11	EAF 2003-2114	1437 Lomita Ave.	Condominium	160 DU	Proposed
12	EAF 2003-4624	407 7th St.	Retail Apartment	5,000 sf 87 DU	Proposed
13	EAF 2004-5009	1351 Sepulveda Blvd.	Warehouse	400,000 sf	Proposed
14	EAF 2004-5009	28000 Western Ave.	Condominium	140 DU	Proposed
15	N/A	Centre Street Lofts Centre St. between 6th and 7th St.	Apartments Retail	116 DU 22,000 sf	Proposed
16	N/A	Rolling Hills Preparatory Private School South of Palos Verdes between Western and Anaheim St.	School	700 students	Approved
17	N/A	Palos Verdes Street Housing 550 and 560 Palos Verdes St.	Townhouse Mid-Rise Apartments High Rise Apartments Retail Restaurant	85 DU 79 DU 166 DU 8,800 sf 3,000 sf	Proposed
18	N/A	Target Co. 1701 N. Gaffey St.	Supermarket	126,000 sf	Proposed

Table IV.J-9
List of Related Projects

Map No.	Project/Case/ Tract No.	Applicant/Location/ Project Description	Land Use	Size	Status
19	N/A	San Pedro Waterfront – Phase I (Bridge to Breakwater) San Pedro Waterfront – Phase II (Bridge to Breakwater)	Retail Office Cruise Ship Retail Office Conference Center Yacht Club Aquatic Center	591,500 sf 100,000 sf 200,000 sf 131,104 sf 12,500 sf 75,000 sf 10,000 sf 30,000 sf	Proposed
20	N/A	Mary Star of the Sea High School Taper Avenue between Sandwood Pl. and John Montgomery Dr.	High School	650 students	Proposed
21	ENV 2005-4801	JCC Homes 1427 N. Gaffey St.	Single-Family	135 DU	Proposed
22	N/A	La Salle Adaptive Reuse 245-255 W. 7th St.	Loft	26 DU	Proposed
23	N/A	Bay View 255 W. 5th St.	Apartment	220 DU	Proposed
24	N/A	Ocean View 111 and 203-233 N. Harbor Blvd.	Loft	144 DU	Proposed
25	N/A	815 S. Grand Ave.	Condominium	12 DU	Proposed
26	N/A	Harborside Terrace 303-308 N. Palos Verdes St.	Condominium	16 DU	Proposed
27	N/A	281 W. 8th St.	Townhome	30 DU	Proposed
28	N/A	420-430 W. 9th St.	Condominium	25 DU	Proposed
29	N/A	Sepia Homes 812 S. Pacific Ave.	Condominium	90 DU	Proposed
30	N/A	Goldenrose St. south of Miraflores Ave.	Single-Family	27 DU	Proposed
31	2005-CEN-2126	Port Police Station & Charter School 330 Center St.	Police Headquarters Office Charter School	155,000 sf 12,500 sf 1,000 students	Proposed
32	ENV 2005-9493MN	Preschool 25000 Normandie Ave.	Preschool	100 students	Proposed
33	TT-60731	1400 W. 260th St.	Condominium	12 DU	Proposed
34	ENV-2004-855-MND	1408 W. Anaheim St.	Townhome	7 DU	Proposed
35	TT-61154	26404 S. Vermont Ave.	Condominium	21 DU	Proposed
36	AA-2004-4179-PMLA	1549 W. 207th St.	Condominium	4 DU	Proposed
37	TT-61562	1610 W. 207th St.	Condominium	5 DU	Proposed
38	AA-2004-4179-PMLA	1614 W. 207th St.	Condominium	4 DU	Proposed
39	ENV-2004-4563-MND	1445 W. 225th St.	Condominium	14 DU	Proposed
40	AA-2004-3530-PMLA	1640 W. 227th St.	Condominium	4 DU	Proposed
41	AA-2004-4563-MND	1636 W. 227th St.	Condominium	4 DU	Proposed
42	ENV-2004-4563-MND	1401 W. Lomita Blvd.	Condominium	62 DU	Proposed
43	VTT-61840	810 Alameda St.	Condominium	107 DU	Proposed
44	TT-61196	315 N. Marine Ave.	Apartment	35 DU	Proposed
45	AA-2004-4103-PMLA	840 W. 40th St.	Condominium	3 DU	Proposed
46	AA-2004-6813-PMLA	1514 W. 207th St.	Condominium	4 DU	Proposed
47	AA-2005-56-PMLA	1610 W. 251st St.	Condominium	4DU	Proposed

Table IV.J-9
List of Related Projects

Map No.	Project/Case/ Tract No.	Applicant/Location/ Project Description	Land Use	Size	Status
48	--	24000 S. Western Ave.	Library	14,650 sf	Under Construction
		City of Rancho Palos Verdes[2]			
49	N/A	Ocean Trails Main Entrance Palos Verdes Dr. South and Forrestal Dr.	Single-Family Affordable Housing Golf Course	75 DU 4 DU 18 holes	Proposed
50	N/A	Ocean Front Seaward side of Palos Verdes Dr. West terminus of Hawthorne Blvd.	Single-Family	79 DU	Proposed
51	N/A	Point View 6001 Palos Verdes Dr. South	Single-Family	84 DU	Proposed
52	N/A	Long Point Resort Hotel 6610 Palos Verdes Dr. South	Resort	400 rooms	Proposed
53	N/A	Point Vicente Interpretive Center 31501 Palos Verdes Dr. West	Office	2,000 sf	Proposed
54	N/A	TTM No. 52666 3200 Palos Verdes Dr. West	Single-Family	13 DU	Proposed
55	N/A	Marymount College Facilities Expansion 30800 Palos Verdes Dr. East	Gymnasium Residence Hall	144,110 sf 270 students	Proposed
56	N/A	Crestridge Estate LLC (Senior Center) 6500 Block of Crestridge Road between Crenshaw and Highridge	Senior Center Senior Condominium	12000 sf 109 DU	Proposed
57	N/A	Crestridge Village North of Crestridge, west of Crenshaw	Condominium	95 DU	Proposed
		City of Rolling Hills Estates[3]			
58	N/A	Rolling Hills Covenant Church Expansion 2221/2222 Palos Verdes Dr. North	Sanctuary	2,250 seats	Proposed
59	N/A	South Coast County Golf Course 25706 Hawthorne Blvd.	Golf Course Clubhouse	18 holes 29,000 sf	Proposed
60	N/A	901 Deep Valley	Senior Housing	41 DU	Approved
61	N/A	981 Silver Spur Rd.	Condominium	18 DU	Pending
62	N/A	828 Silver Spur Rd.	Condominium	23 DU	Pending
63	N/A	627 Deep Valley	Condominium Retail	58 DU 6,000 sf	Pending
64	N/A	927 Deep Valley	Condominium Retail	120 DU 10,000 sf	Pending
65	N/A	827 Deep Valley	Condominium	16 DU	Pending
66	N/A	NE corner of Palos Verdes Dr. East and Palos Verdes Dr. North	Single-Family	13 DU	Pending
67	N/A	5883 Crest Rd.	Mixed-Use – Office/Retail	5,670 sf	Approved
		City of Carson[4]			
68	N/A	South Bay Christian Alliance Church 21125 S. Figueroa St.	Church	5,800 sf	Proposed
69	N/A	Dominguez Hills Village NW corner of Victoria St. and Central Ave.	Single-Family Condominium	101 DU 81 DU	Under Construction
70	N/A	Centex Homes Avalon Blvd between 228th and 231st Sts.	Condominium	147 DU	Under Construction
71	N/A	Steve Nazemi 1216-1226 E. Carson St.	Condominium	7 DU	Pending
72	N/A	The Olson Company 22518-22606 Figueroa St.	Single-Family	45 DU	Under Construction

Table IV.J-9
List of Related Projects

Map No.	Project/Case/ Tract No.	Applicant/Location/ Project Description	Land Use	Size	Status
73	N/A	Elite Homes 643 E. 223rd St.	Condominium	40 DU	Approved
74	N/A	Carson Senior Village 22125 Main St.	Senior Housing	64 DU	Approved
75	N/A	Trip-Star Group 235 E. 220th St.	Condominiums	11 DU	Approved
76	N/A	Mohamed Pournamdari 553 E. 213th St.	Condominium	7 DU	Approved
77	N/A	JCA Resources, Inc. 2350 E. 223rd St.	Office	126,400 sf	Approved
78	N/A	Carson Toyota (Demolition of existing building and construct new dealership)	Dealership	(17,000 sf) 162,308 sf	Pending
79	N/A	Hopkins Real Estate Group 20700 S. Avalon Blvd.	Retail	41,000 GLSF	Proposed
80	N/A	Mar Ventures Ltd. Corner of Torrance Blvd. and Figueroa St.	Mixed-Use Light Industrial Park Light Industrial	13,085 sf 384,922 sf 170,243 sf	Under Construction
81	N/A	Child Development Center 22036-22108 Avalon Blvd.	Child Care Facility	120 children	Proposed
City of Long Beach[5]					
82	N/A	The Pike at Rainbow Harbor Between Long Beach Aquarium and Convention Center	Commercial Mixed-Use (Entertainment, Retail, Restaurant)	350,000 sf	Under Construction
83	N/A	City Place East of Long Beach Blvd. between 3rd and 6th St.	Retail Condominium	450, 000 sf 320 DU	Built Under Construction
84	N/A	Lofts on 4th SW corner of 4th and Alamitos Ave.	Apartments Retail	34 DU 6,400 sf	Proposed
85	N/A	New Mark Twain Library NE corner of Anaheim St. and Gundry Ave.	Library	16,000 sf	Proposed
86	N/A	West Gateway – New Urban Community 8 square blocks situated at the entry of the City's downtown core	Condominium Mid-Rise Apartment Retail	391 DU 409 DU 15,000 sf	Approved
City of Torrance[6]					
87	CUP02-00003	Airport Plaza NW corner of Pacific Coast Hwy. and Crenshaw Blvd.	Shopping Center Expansion	42,536 GLSF	Under Construction
88	CUP02-00009	Huamin Chang 2360 Sepulveda Blvd.	Hotel	39 rooms	Under Construction
89	CUP02-00024	Ken Proctor 2145 Plaza Del Amo	Condominium	6 DU	Under Construction
90	CUP02-0020	Watt Developers 3520 Torrance Blvd.	Senior Housing Townhome	60 DU 100 DU	Approved Approved
91	CUP00-00006	Torrance Memorial Medical 3330 Lomita Blvd.	Medical Office Office	15,240 sf 94,760 sf	Under Construction
92	MOD02-00004	Jamie Alai 23711 Crenshaw Blvd.	Self Storage	21,819 sf	Approved
93	CUP02-00018	Cheryl Vargo 2410 Apple Ave.	Condominium	4 DU	Approved
94	CUP02-00022	Post Avenue Real Property, LP 1321 Post Ave.	Condominium	13 DU	Under Construction
95	CUP02-00023	Post Avenue Real Property, LP 1321 Post Ave.	Condominium Retail	13 DU 3,962 sf	Under Construction

Table IV.J-9
List of Related Projects

Map No.	Project/Case/ Tract No.	Applicant/Location/ Project Description	Land Use	Size	Status
96	CUP02-00029	Chester Smith Associates 1021 Cravens Ave.	Condominium	20 DU	Approved
97	CUP02-00030	Raju Chhabria 2413 Cabrillo Ave.	Condominium	5 DU	Approved
98	CUP02-00040	Maupin Development 20536 Earl St.	Condominium	32 DU	Under Construction
99	CUP03-00002	JCC Homes 23747 Arlington Ave.	Condominium	8 DU	Under Construction
100	CUP03-00004	Anastazi Development Company 21345 Hawthorne Blvd.	Senior Housing	112 DU	Under Construction
101	CUP03-00019	Park/Gibbs Development 2708 Cabrillo Ave.	Senior Housing Condominium	43 DU 48 DU	Approved
102	CUP03-00003 CUP02-00032	St. Paul Properties 18825 Van Ness Ave.	Office Self Storage	34,800 sf 203,000 sf	Approved
103	CUP01-00025	Michael Mulligan 2264 Dominguez St.	Condominium	13 DU	Approved
104	CUP03-00013	Maricopa Properties – Montecito Estates 2829 Maricopa St.	Condominium	104 DU	Approved
105	CUP03-00034	Tom Paradise 1826 Oak St.	Townhome	265 DU 60 DU	Approved
106	CUP03-00034 TTM061850	Standard Pacific Homes 2349 Jefferson Street	Condominium	81 DU	Proposed
107	N/A	TorMed Medical Center Expansion NE corner of Skypark Dr. and Medical Center Dr.	Medical Office	131,560 sf	Proposed
108	CUP03-00051	Unity Church of South Bay 2545 237th Street, A	Church	5,400 sf	In Process
109	CUP03-00036	Courtyard Villa Estates, LLC 4004 Sepulveda Blvd.	Senior Housing	44 DU	Approved
110	CUP03-0047	Elite Homes 739-745 Border Ave.	Condominium	7 DU	Approved
111	CUP03-00035	Washington Street Developers 2080 Washington Ave.	Condominium	21 DU	Approved
112	CUP04-00007	Dan Withee 24510 Hawthorne Blvd.	Office Restaurant Condominium	3,600 sf 1,030 sf 14 DU	Approved
113	CUP03-00053	Douglas Maupin 6226 Pacific Coast Hwy.	Condominium	16 DU	Approved
114	CUP99-00036	Maupin Development / The Breakers 2850 Monterey St.	Condominium	128 DU	Under Construction
115	CUP03-00009	Ball Corporation 500 Crenshaw Blvd.	Warehouse	156,000 sf	Under Construction
116	CUP04-00039	Stephenson Lon 18600 Hawthorne Blvd.	Auto Dealership Expansion	4,450 sf	Under Construction
117	CUP04-00011	Bishop Montgomery High School 5430 Torrance Blvd.	School Expansion	14,300 sf	Approved
118	CUP04-00014	Shea Homes L.P. 21515 Hawthorne Blvd.	Condominium	226 DU	In Process
119	CUP04-00030	JCC Homes 4343 190th St.	Condominium	22 DU	Approved
120	CUP04-00042	The Magellan Group 4302-10 190th St.	Auto Dealership	31,500 sf	Approved
121	CUP03-00037	Watt and Maupin Development 2740 Lomita Blvd.	Single-Family Condominium Retirement Community	63 DU 346 DU 85 DU	In Process

Table IV.J-9
List of Related Projects

Map No.	Project/Case/ Tract No.	Applicant/Location/ Project Description	Land Use	Size	Status
122	CUP04-00026	Keith Palmer 2700 Skypark Dr.	Retail	15,000 sf	Submitted
123	CUP04-00032	Sean Doyle 2303 Jefferson St.	Condominium	41 DU	Submitted
124	CUP04-00036	Pacific Storage Partners, Inc. 4330 190th St.	Warehouse	15,000 sf	Submitted
125	CUP04-00012	Nathan Battle 1907 Abalone Ave.	Warehouse	22,854 sf	Approved
126	CUP04-00031	George Kirikorian 115 & 131 Palos Verdes Blvd.	Condominium Retail	23 DU 6,867 sf	Approved
127	CUP04-00033	AP-Escondido; c/p The Abbey Company 23600 & 23610 Telo Ave.	Medical Office	70,343 sf	Approved
128	CUP04-00035	Ghussan Baddour Hawthorne Blvd./Rollling Hills Rd.	Office Single-Family	949 sf 1 DU	In Process
129	CUP04-00038	DCA Civil Engineering Group 2909 Pacific Coast Hwy.	Office Automobile Service	988 sf 5 bays	In Process
130	CUP04-00040	Fancher Development Services 25308 Crenshaw Blvd.	Restaurant	6,512 sf	Approved
131	CUP04-00041	Withim Corporation 22501 Crenshaw Blvd. #200	Coffee Shop	940 sf	In Process
132	CUP04-00043	Sunrise Senior Living 25535 Hawthorne Blvd.	Assisted Living	103 beds	In Process
133	CUP05-00001	Miletich-Jones Land Co. 20301 Hawthorne Blvd.	Restaurant Market	1,800 sf 2,327 sf	In Process
		City of Lomita[7]			
134	SP No. 977	Mr. Don Barteld 25610 Narbonne Ave.	Office Expansion	810 sf	Approved
135	TTM No. 53873	Mr. Tom Frederikson 2215-2219 W. 241st St.	Condominium	9 DU	Approved
136	ZV No.167 SP No.986	Mr. Jeh Meher 26327 Western Ave.	Health Gym	13,533 sf	Approved
137	SP No. 978	SUBTEC (Cheryl Vargo) 2040 & 2046 Lomita Blvd.	Single-Family Commercial	7 DU 10,140 sf	Proposed
138	TTM No.60165	Mr. Peter Frederiksen 25819-25 Eshelman Ave.	Senior Housing	24 DU	Proposed
139	TTM No. 54200	Tom Yuge 26001 Eshelman Ave. and 26004 Avocado St.	Single-Family	6 DU	Approved
140	CUP No. 225	John Koza 25316 Ebony Lane	Senior Housing	42 DU	Proposed
141	ZV No. 176	Ricardo Velasquez 1830 Pacific Coast Hwy.	Commercial Expansion	1,192 sf	Approved
142	TTM No. 53950	SUBTEC (Cheryl Vargo) 1748-1751 W. 257th St.	Condominium	6 DU	Approved
143	SP No. 995	Faizel Tar 2020 Lomita Blvd. #6	Auto Rental & Sales	1,014 sf	Approved
144	SP No. 996	George Mcguire SE corner of Western Ave. and 262nd St.	Office Commercial	11,000 sf 17,300 sf	Approved
145	TTM 61454 CUP 231 ZTA 2004-3	Tom Yurge 25322 Cypress St.	Senior Housing	6 DU	Approved
146	CUP 228	Robert Garstein 25312-25318 Narbonne Ave.	Senior Housing	24 DU	Proposed

Table IV.J-9
List of Related Projects

Map No.	Project/Case/ Tract No.	Applicant/Location/ Project Description	Land Use	Size	Status
147	SP 1003 HVP 73 TTM 53874	Charles Couey 25829-25837 Eshelman Ave.	Condominium	16 DU	Approved
148	SP 1012	Greg Warren 25209 Narbonne Ave.	Medical Office	1,650 sf	Approved
149	CUP 229 ZTA 2004-02	William James 1834 255th St.	Assisted Living	15 persons	Approved
150	SP 1004 ZTA 2004-01 TTM No. 61575	Charles Couey 2247-2261 W. 241st St.	Condominium	16 DU	Proposed
151	SP 1007	Donna George 2100 Lomita Blvd.	Beauty Salon	888 sf	Approved
152	SP 1014 TPM 61155	Lanco Engineering 1837 and 1839 257th St.	Condominium	3 DU	Proposed
153	SP 1013 TTM 60651	Obradovich Corporation 24633 Pennsylvania Ave.	Condominium	5 DU	Proposed
154	CUP 232	Charles Ueda 2103-2139 Lomita Blvd.	Senior Housing	46 DU	Approved
155	SP 1029	Jason Fromm 2212 Lomita Blvd.	Office	7,548 sf	Approved
156	ZV 188 SP1032	Charles Couey 2067-2077 240th St.	Single-Family	5 DU	Approved
157	CUP 234 SP 1037	Dan Schultz (Milestone Management) SW corner of Narbonne Ave. and Pacific Coast Hwy.	Pharmacy w/ drive through	13,013 sf	Approved
158	CUP 235 SP 1044 GPA 2005-01	Mehrzad Givechi 25114-8 Narbonne Ave.	Condominium	40 DU	Approved
159	CUP 211	Family ADHC – Lomita 2280 Lomita Blvd.	Medical Office Expansion	2,915 sf	Approved
160	DOS 2005-01	Mary Elizabeth Lewis 2049 Pacific Coast Hwy.	Tutoring Center	1,000 sf	Approved
161	DOS 2005-02	Julie Olson 24100 Narbonne Ave. Suite 103	Coffee House	2,048 sf	Approved
162	ZV 189 SP 1041	Dennis Pauslan 24831 Narbonne Ave.	Warehouse	1,900 sf	Approved
163	CUP 70 ZV 190	Y&S Auto Body 24720 Crenshaw Blvd.	Office	9,228 sf	Approved
164	SP 1049	Bijan Haleeli 2244 Pacific Coast Hwy.	Retail	18,285 sf	Proposed
165	DOS 20005-04	Stacey Witner 24429 Narbonne Ave.	Retail	900 sf	Proposed
166	ZV 196	Mark Consalvo 25834 Narbonne Ave.	Restaurant	6,726 sf	Proposed
167	VTPM 063303 CUP 239 SP 1057	Tom Yuge 2155 W. 240th St.	Senior Housing	4 DU	Proposed
County of Los Angeles[8]					
168	CP02-218 TR53937543502	21000 Normandie Ave.	Condominium	112 DU	Approved
169	CP03-041 292000	19000 Normandie Ave.	Adult Business/Bar	21,760 sf	Approved
170	CP03-048 543503	735-809 W. Carson St.	Office Residence Storage	1,914 sf 1,300 sf 130,283 sf	Pending

Table IV.J-9
List of Related Projects

Map No.	Project/Case/ Tract No.	Applicant/Location/ Project Description	Land Use	Size	Status
171	CP03-137 TR060027 543503	1010-1022 W. 223rd St. Torrance	Condominium	16 DU	Pending
172	04-108 TR060481	1154 W. 223rd St.	Single-Family	5 DU	Pending
173	CP04-175 TR061387 543602	22800 Normandie Ave.	Condominium	79 DU	Pending
174	N/A	SE corner of Normandie Ave./223rd St.	Condominium	58 DU	Proposed

N/A – Not applicable
DU – Dwelling units
sf – Square feet
GLSF - Gross leasable square feet

1 *Source: City of Los Angeles Department of City Planning; LADOT.*
2 *Source: City of Rancho Palos Verdes.*
3 *Source: City of Rolling Hills Estates.*
4 *Source: City of Carson.*
5 *Source: City of Long Beach.*
6 *Source: City of Torrance.*
7 *Source: City of Lomita.*
8 *Source: Los Angeles County Department of Regional Planning.*

Source: LLG, 2006 (see Appendix IV.J-1 to this Draft EIR).

Traffic volumes expected to be generated by the related projects were calculated using rates provided in the ITE Trip Generation manual. The related projects' respective weekday traffic generation for the AM and PM peak hours, as well as on a daily basis for a typical weekday, is summarized in Table 8-2 in Appendix IV.J-1 to this Draft EIR. The anticipated distribution of the related projects traffic volumes to the study intersections during the weekday AM and PM peak hours is displayed in Figures IV.J-13 and IV.J-14, respectively. The related projects' respective Saturday traffic generation for the mid-day peak hour, as well as on a daily basis, is summarized in Table 8-3 in Appendix IV.J-1 to this Draft EIR. The anticipated distribution of the related projects traffic volumes to the study intersections during the AM and PM peak hours is displayed in Figure IV.J-15.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Pointer 33°45'42.48" N 118°16'45.28" W elev 15 ft
Streaming 100%
Eye alt 10031 ft