

LAHD Responses to Response to NRDC (April 15, 2009)

- 1. In our comments on the draft SEIS/SEIR, we encouraged the Port to ensure that the impacts of the *entire* Channel Deepening project are adequately analyzed and mitigated.**

As discussed in the Final SEIS/SEIR, the entire impacts of the proposed Action were adequately analyzed in the SEIS/SEIR. As discussed in Section 1 of the Draft and Final EIS/EIR, the overall purpose for the Proposed Action is to provide approximately 3.0 million cubic yards (mcy) of additional disposal capacity for the dredge material to complete the previously approved Channel Deepening Project and to beneficially reuse the dredge material in the Port of Los Angeles and optimize disposal of the dredge material. The US Army Corps of Engineers (USACE) and the Los Angeles Harbor Department (LAHD) prepared the SEIS/SEIR to address all impacts associated with both the remaining dredging left and the additional disposal sites necessary to complete the Channel Deepening Project authorized by the Water Resources Development Act (WRDA) of 2000.

- 2. It is hard to fathom how the Port can move forward with any part of this project given the glaring deficiencies in its older environmental documents.... Accordingly to take the position as the Final SEIS/SEIR asserts, that the environmental impacts have been adequately analyzed and addressed in the prior environmental documents is nothing short of implausible.**

Please see response to comment 1 above. As discussed in Section 1 of the Draft and Final EIS/EIR, the overall purpose for the Proposed Action is to provide approximately 3.0 million cubic yards (mcy) of additional disposal capacity for the dredge material to complete the previously approved Channel Deepening Project and to beneficially reuse the dredge material in the Port of Los Angeles and optimize disposal of the dredge material. Additional disposal sites are needed because disposal sites developed for dredge material identified in the 2000 SEIS/SEIR have been found to be inadequate for the total volume of sediments that require removal from the Main Channel and adjacent berth areas to complete the project. The SEIS/SEIR addresses all impacts associated with both the remaining dredging left and the additional disposal sites necessary to complete the Channel Deepening Project authorized by the WRDA 2000.

As discussed in Section 2 of the Draft and Final SEIS/SEIR, it is estimated that approximately 3.0 mcy of dredge material needs to be disposed to complete the Channel Deepening Project. The estimated volume of material to be disposed is based on the status of construction as of November 2005 and includes: approximately 1.025 mcy to be dredged from the Main Channel, approximately 0.675 mcy to be dredged from berth deepening (please see below, while the berth area is dredged the dredging does not extend to the wharf face), and approximately 0.815 mcy of material that was previously dredged from the Channel Deepening Project and temporarily placed on the Southwest Slip Disposal Area 1 as surcharge (which includes the surcharge pile at Berth 97-109, which would eliminate associated dust issues at the Berth 97-109 area). This volume also includes material needed to be dredged for foundation preparation of rock dike structures to construct the new disposal sites. The potential environmental impacts associated with all remaining dredging were

analyzed in the Draft and Final EIS/EIR, although assessed in the 2000 SEIS/SEIR, was reassessed in the Draft SEIS/SEIR.

In regards to the comment that the document relied on stale environmental analyses to conclude that the proposed alternatives would not produce any significant air impacts from larger ships entering the Port, as discussed in the Final SEIS/SEIR, dredging is restricted to the Main Channel and the base of the berthing areas and does not extend to individual berths (i.e. the wharf face). If deepening to the individual berths were to occur under current conditions, the wharves would be destabilized. Therefore, the berthing areas along the north slope of the Cerritos Channel will not be dredged as part of the Proposed Action. Therefore, ships requiring the -53 ft depth achieved by the dredging will not be able to berth at individual terminals as a result of the Proposed Action.

The construction of new land provides the potential for upland impacts. Alternative 1 includes construction of a five acre fill at Berths 136-139 and an eight acre confined disposal site (CDF) at Berths 243-245. In regards to the five acre fill at Berths 136-139, if Alternative 1 is approved and constructed, the new 5-acre land area would be developed in the future as part of Phase I of the Berth 136-147 Project. Development and operation of the five acres would not allow for any increases in throughput at the terminal because the five acres would be used to improve vehicle access to the wharf area not for additional container storage. The realigned wharf roadway would facilitate safer and more efficient truck and equipment movement. Both development of the five acres of new land as backlands and operation of the five acres in conjunction with the rest of the Berth 136-147 Terminal have been assessed in the Berth 136-147 [TraPac] Container Terminal Project EIS/EIR, a document recently certified by the Board of Harbor Commissioners and consistent with the Clean Air Action Plan (CAAP). Therefore, the only new potential upland impacts would be associated with the eight acres of new land at Berths 243-245 if Alternative 1 is approved and constructed. Potential impacts related to future development of the eight acres of new that would be created at Berths 243-245 have been addressed in Section 3.14.2 of the SEIS/SEIR.

Impacts associated with the already completed sections of the Channel Deepening Project and past modifications to the project were assessed in previous documents (USACE 2004, USACE 2003, USACE 2002, USACE and LAHD 2000). These documents are correctly incorporated by reference and are summarized where applicable within the Draft SEIS/SEIR.