

September 24, 2007

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

Dr. Ralph G. Appy
Port of Los Angeles
425 S. Palos Verdes St.
San Pedro, CA 90731

Re: TraPac EIS/EIR

Dear Dr. MacNeil & Dr. Appy,

Established in 1924, Central City Association (CCA) is L.A.'s premier business advocacy association whose 415 members employ over 300,000 people in the Los Angeles region. On behalf of CCA, I am writing to urge the timely completion of the DEIR/DEIS for the redevelopment of the TraPac Terminal site.

This project is significant to the Port of Los Angeles because of its strides to meet the green growth goals put forward in the Clean Air Action Plan. CCA congratulates the Port of Los Angeles and the US Army Corps of Engineers, Port Commissioners and staff for producing the draft EIS/EIR – the first step in ensuring that our ports can efficiently manage expected growth while mitigating environmental impacts.

As you are well aware, the Ports of Los Angeles and Long Beach are a major economic driver, providing approximately 500,000 jobs in the greater five county region and more than one million jobs nationally. At the same time, the ports are potentially facing a major capacity crisis. In its May 2007 forecast, The Los Angeles Economic Development Corporation (LAEDC) predicted that the ports will grow 9.2% this year to 17.2 million TEUs. We firmly believe that port growth, and the appropriate accommodation of that growth, is critical not only to the Southern California and national economies, but also to our air quality.

Re-development of the TraPac terminal is an important step towards efficiently managing the expected growth in container volume and mitigating environmental impacts. Terminal efficiency will nearly double, while minimizing truck idling and increasing use of rail. A new on-dock rail yard will better accommodate larger ships and more containers while reducing emissions, and a new gate will allow trucks to enter and exit with less community impact. As a result, the EIR shows that the proposed project will reduce emissions of green house gasses and criteria pollutants below baseline levels. The proposed project also meets the green growth goals of the Clean Air Action Plan and significantly reduces health risks to local communities through numerous environmental features. In addition, a 30-acre landscaped buffer zone separating the community from port operations would provide much needed green space and recreational facilities to community members.

Conversely, the “no project” alternative clearly shows that a failure to complete this project is detrimental to air quality in the local community and the region. In fact, even if no changes are made to the facility, the container cargo volume at the TraPac terminal is expected to nearly double without any of the environmental benefits of redeveloping the site. Moreover, it’s clear that certain improvements can only be provided with the site redesign outlined in the EIR.

We believe that this project represents an important “green growth” initiative to provide more efficient goods movement through the Port of Los Angeles. We therefore support the project in concept, and encourage the Port of Los Angeles to continue moving the environmental process forward to completion.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carol E. Schatz".

Carol E. Schatz
President & CEO
Central City Association of Los Angeles