



**TraPac**

Los Angeles • Oakland

August 10, 2007

**VIA FACSIMILE & U.S. MAIL  
(310) 519-0291**

David Freeman  
President, Board of Harbor Commissioners  
Port of Los Angeles  
425 South Palos Verdes Street, 5<sup>th</sup> Floor  
San Pedro, California 90731

**RE: Berths 136-147 DEIR/EIS**

Dear President Freeman:

The Berth 136-147 DEIR/EIS for TraPac is an effort to refurbish the most obsolete terminal in the San Pedro Bay port complex, having the only obstructed gate, the only facility without access to an on-dock rail yard and the shortest berths and oldest cranes in existence.

To offset these limitations, TraPac has spent millions of dollars on technology and infrastructure to reduce and/or eliminate bottlenecks within the facility. Nonetheless, both TraPac and the Port of Los Angeles have lost millions of dollars in business to the Port of Long Beach which can currently offer more advanced terminal alternatives without the cost of current environmental mitigation. In the last few years CMA-CGM and Wan Hai have left our terminal due to a lack of on-dock rail and high rates caused by the Port, and relocated to Long Beach.

The certification of the DEIR/EIS will eliminate many of these current terminal inefficiencies and implement much needed cutting-edge environmental technologies including:

- Trucks queuing into the community caused by the numerous daily trains blocking the main gate to the facility;
- Additional grade crossings so that the community will not be affected by rail will be improved by grade separations;
- The elimination of 800 truck trips per day, nearly 5,000 truck trips per week and over 250,000 truck trips per year with the use of the on-dock rail;

TraPac-1

TraPac-2

**David Freeman**

August 10, 2007

Page - 2 -

TraPac-2

- Vessels will be worked with more units of newer, faster cranes thus reducing the time at berth. These newer, faster cranes will enable a net reduction of crane units on the facility;
- The citizens of Wilmington will enjoy a 25-acre greenbelt on industrial land that was purchased at tens of millions of dollars, and will be improved at the cost of tens of millions of dollars more, on what was originally earmarked for terminal expansion.

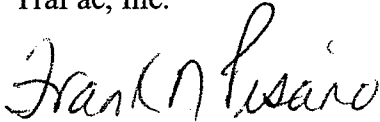
TraPac-3

All the above benefits will be further enhanced with many other mitigation measures which include the complete replacement of the terminal truck fleet with the cleanest, most efficient engines that burn ultra low sulfur fuel, upgrades of filtration systems and fuels for all other terminal handling equipment, AMP, slide valves and fuel upgrades for vessels calling on the facility.

There is simply no realistic better alternative. We respectfully ask your support and approval of this project.

Sincerely,

TraPac, Inc.



Frank N. Pisano  
Vice President

FNP:all

**TraPac, August 10, 2007**

**TraPac-1 through TraPac-3.** Thank you for your comments.

LM

Post Office Box 90

Wilmington, California 90748



September 13, 2007

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

RECEIVED  
 SEP 17 2007  
 U.S. ARMY CORPS OF ENGINEERS  
 LOS ANGELES DISTRICT

Dr. Ralph Appy  
 Port of Los Angeles  
 425 South Palos Verdes Street  
 San Pedro, California 90731

**Subject: Berths 136-147 [TraPac] Container Terminal Project**

Dear Dr. MacNeil and Dr. Appy:

The Wilmington Chamber of Commerce has had the opportunity to review the DRAFT Environmental Impact Statement/DRAFT Environmental Impact Report (DEIS/EIR) for the Berths 136-147 [TraPac] Container Terminal Project ("the Project") and would like to make the following comments.

The Wilmington Chamber of Commerce has represented business and other organizations in the area for over 100 years. Our diverse membership includes large Fortune 500 companies, medium sized regional and local corporations, and small businesses. Our membership also includes non-profits who receive our financial support through a variety of programs and sponsorships.

WCoC-1

Our membership and support of the community is all consistent with our Mission Statement "The Wilmington Chamber of Commerce promotes, supports and enhances a positive business environment and improves the quality of life in the community."

We would like to congratulate the Port of Los Angeles for producing the draft EIR/EIS for the Project, the first of its type in many years. We believe that the issuance of this and subsequent EIR/EIS's is essential to the improvement of the environment.

WCoC-2

We believe that the Project will be beneficial to the community through the introduction of components of the San Pedro Bay Ports Clean Air Action Plan which TraPac would not otherwise be obligated to implement. The requirements for emission reductions from ocean

WCoC-2 going vessels, trains, handling equipment, harbor craft, and truck is something this community has been looking forward to for a long time.

WCoC-3 Enough cannot be said about the 30-acre landscaped buffer zone, which is a part of the Project that will separate the industrial activity from the residential community. Community members, as well as port staff and consultants, have dedicated thousands of hours into this component of the Project. While not everyone agrees with every aspect of the buffer, it has been thorough vetted in public and the buffer appeals to a wide range of the community.

WCoC-4 Growth in the port is inevitable. Since it is not the port that creates the demand for growth but consumers, it is wise to get out in front of the increase in activity and parlay the opportunity for growth with a decrease in air emissions among other environmental mitigation.


WCoC-5 As a chamber of commerce, we are particularly interested in the vitality of the business community. The Project, including construction, will provide hundreds of new jobs. We encourage the Port to consider utilizing qualified local companies and personnel for the construction phase of this project, and we encourage TraPac to consider utilizing local personnel for facility staffing increases the occur as a result of the Project.

WCoC-6 For these reasons, the Wilmington Chamber of Commerce supports the project, but we would like to voice our concern about the potentially negative impact due to truck traffic intruding into the Wilmington community outside of designated truck routes. We highly recommend that this intrusion be avoided through a number of methods including signage, enforcement, education, and other methods which would alert the truck driving population of the inappropriateness and illegality of entering the residential and commercial areas of Wilmington.

As you know, if the Project is not approved, the future of the buffer will be in doubt, the opportunity to achieve "green growth" will be lost, and the prospect for a reduction in air emissions will be delayed.

We look forward to participating in the process of moving the Project forward. If the Wilmington Chamber of Commerce can help in any way, please do not hesitate to contact me.

Regards,

  
Patrick Wilson  
President

cc: Geraldine Knatz, Executive Director, Port of Los Angeles  
S. David Freeman, President, Los Angeles Board of Harbor Commissioners  
Jerilyn Lopez Mendoza, Vice President, Los Angeles Board of Harbor Commissioners  
Kaylynn L. Kim, Commissioner, Los Angeles Board of Harbor Commissioners  
Douglas P. Krause, Commissioner, Los Angeles Board of Harbor Commissioners  
Joseph R. Radisich, Commissioner, Los Angeles Board of Harbor Commissioners



---

**Wilmington Chamber of Commerce, September 13, 2007**

- WCoC-1.** Your comment is appreciated and will be forwarded to the Board of Harbor Commissioners.
- WCoC-2.** Your comment is appreciated and will be forwarded to the Board of Harbor Commissioners.
- WCoC-3.** Your comment is appreciated and will be forwarded to the Board of Harbor Commissioners.
- WCoC-4.** Your comment is appreciated and will be forwarded to the Board of Harbor Commissioners.
- WCoC-5.** Your comment is appreciated and will be forwarded to the Board of Harbor Commissioners.
- WCoC-6.** Thank you for your comment. As discussed in Section 3.8 and in response to comment NRDC-50, the EIS/EIR appropriately evaluated impacts within the individual resource area section. Truck use within Wilmington and off-site container storage facilities were addressed in the analysis of Impact LU-3 because of TraPac's unique proximity to Wilmington and in response to comments on these issues raised during scoping and at the request of PCAC. There is a history of truck incursion complaints from the Figueroa/Harry Bridges Blvd./Alameda Streets that form a direct boundary with the Community of Wilmington and which was the partial reasoning behind the original "B" Street Project. The construction of the buffer, and several street closures as part of the proposed project will resolve a majority of these incursions. However, in light of the fact that these incursions are still possible, especially in the Alameda Street area, Mitigation Measures LU-1 and LU-2 were added here to further discourage the trucks from leaving the designated truck routes that border the Port and directly entering the community. It should be noted that CEQA does not require illegal activity to be identified as an environmental impact. (*See Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 371 [alleged illegal activity may be relevant to certain aspects of project approval, but it is not a CEQA consideration]; *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428 ["[W]hether the past actions of third parties were properly authorized may be of interest to resource agencies for enforcement actions but are not pertinent to the proposed project."].) However, to be very conservative and to address concerns raised in scoping, the analysis went beyond CEQA's requirements to include a discussion of such activity.

With respect to Mitigation Measures LU-1 and LU-2, the Port has hired an officer whose sole job is to patrol the Wilmington area for truck violations. In addition, the Port has posted over fifty signs in Wilmington with information about the trucks routes and prohibitions. LU-1 would build on actions already taken by the Port by further surveying the Wilmington area to identify additional locations where signage may help restrict truck activity from residential areas. In addition, LU-2 will be amended as follows:

**Mitigation Measure LU-2: Truck Traffic Enforcement.** Port police will increase patrols to further enforce the prohibition against truck traffic that might enter residential streets from the designated truck routes adjacent to the Port. The Port Police will prepare a quarterly report on truck traffic enforcement actions.



San Pedro Peninsula  
Chamber of Commerce  
San Pedro, CA



September 21, 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 Street  
San Pedro, CA 90731

**Re: TraPac Draft EIS/EIR**

Dear Dr. MacNeil & Dr. Appy:

On behalf of **The San Pedro Chamber of Commerce**, we would like to congratulate the Port of Los Angeles, for producing the draft EIS/EIR for the TraPac Container Terminal Project. This is the first step in ensuring that our ports can efficiently manage expected growth while mitigating environmental impacts. This project represents an important step to ensure green growth at the Port of Los Angeles.

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 3 million jobs nationally. At the same time, the ports are potentially facing a major capacity crisis. In its May forecast, LAEDC predicted that the ports will grow 9.2% this year to 17.2 million TEUs. (The ports essentially predict a 6.4% increase to 16.8 million TEUs.)

SPCoC-1

We firmly believe that port growth, and the appropriate accommodation of that growth, is critical not only to the Southern California and national economy, but also to the economic success and quality of life in San Pedro and Wilmington, the Harbor Area communities immediately adjacent to the Port of Los Angeles.

The Harbor Area has a long history including its maritime heritage, and our community's future is closely tied to the future success of the Port. **Accordingly, the San Pedro Chamber of Commerce strongly supports the TraPac EIR proposal with all included mitigation and for off-port mitigation in San Pedro and Wilmington.**

Re-development of the TraPac terminal is an important step towards efficiently managing the expected growth in container volume and mitigating environmental impacts. In addition, a 30-acre landscaped buffer zone separating the community from port operations would provide much-needed green space and recreational facilities.

SPCoC-2

We believe that the proposed project represents an important "green growth" initiative to provide more efficient goods movement through the Port of Los Angeles with a concurrent reduction in emissions. We therefore support the project with the addition of mitigation measures to address off-port impacts in San Pedro and Wilmington, and encourage the Port of Los Angeles to move the approval process forward to a quick completion.

Sincerely,

Camilla Townsend  
President, CEO  
San Pedro Chamber of Commerce

**San Pedro Chamber of Commerce, September 21, 2007**

**SPCoC-1.** Your comment is appreciated and will be forwarded to the Board of Harbor Commissioners.

**SPCoC-2.** Your comment is appreciated and will be forwarded to the Board of Harbor Commissioners.





# THE LOS ANGELES CUSTOMS BROKERS & FREIGHT FORWARDERS ASSOCIATION, INC.

August 13, 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

RECEIVED

AUG 16 2007  
Env. Mgmt. Div.  
Harbor Dept.  
City of L.A.

Dear Dr. MacNeil & Dr. Appy:

On behalf of Los Angeles Customs Brokers & Freight Forwarders Association (LACBFFA), I am writing to support the EIS/EIR process for the TraPac Container Terminal Project, which represents an important step to ensure green growth at the Port of Los Angeles. LACBFFA congratulates the Port of Los Angeles, 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.

We all know the Ports of Los Angeles and Long Beach are major economic drivers, providing approximately 500,000 jobs in the greater five county region and more than 3 million jobs nationally. Our 200 plus members derive their livelihood from international commerce coming through our two ports. The projected growth of the ports is staggering.

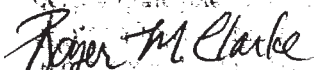
We firmly believe that port growth, and the appropriate accommodation of that growth, is critical not only to the Southern California and national economy, but also to our air quality.

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. 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 CAAP and significantly reduces health risk 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 local and regional air quality in the local community and the region. In fact, even if no changes are made to the existing 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 review process forward to completion.

Sincerely,

  
Roger M. Clarke  
President

LACBFF-1

LACBFF-2

LACBFF-3

**Los Angeles Custom Brokers and Freight Forwarders Association, Inc., August 13, 2007**

- LACBFF-1.** Your comment is noted and will be forwarded to the Board of Harbor Commissioners for their consideration.
- LACBFF-2.** Your comment is appreciated and will be forwarded to the Board of Harbor Commissioners.
- LACBFF-3.** The comment is acknowledged and appreciated.



# HARBOR ASSOCIATION OF INDUSTRY & COMMERCE

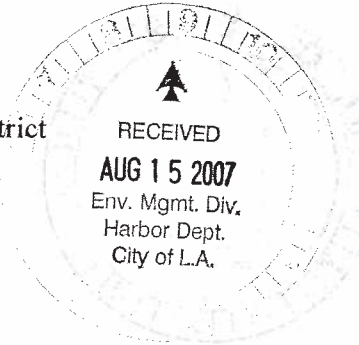
P.O. Box 4250 • Sunland, CA 91041

Phone: 818-951- 6088 • Fax: 818-353-5976

Website: www.HarborAssn.com • E-Mail: info@harborassn.com

August 3, 2007

Dr. Spencer D. MacNeil  
U.S. Army Corps of Engineers, L.A. 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:

On behalf of the Harbor Association of Industry & Commerce (HAIC), 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. HAIC congratulates the Port of Los Angeles and the U.S. 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're 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 1 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. (The ports predict a 6.4% increase to 16.8 million TEUs.)

HAIC-1

We firmly believe that port growth, and the appropriate accommodation of that growth, is critical not only to the Southern California and national economy, 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. 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 risk to local communities several 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.

HAIC-2

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.

HAIC-3

Sincerely,

Thomas A. Poe  
President

**Harbor Association of Industry & Commerce, August 3, 2007**

**HAIC-1.** Your comment is appreciated and will be forwarded to the Board of Harbor Commissioners.

**HAIC-2.** Your comment is noted and will be forwarded to the Board of Harbor Commissioners for their consideration.

**HAIC-3.** The comment is acknowledged and appreciated.

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.

CCA LA-1

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.

CCA LA-2

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.

CCA LA-3



CCALA-4

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,



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

**Central City Association of Los Angeles, September 24, 2007**

**CCA LA-1.** Your comment is appreciated and will be forwarded to the Board of Harbor Commissioners.

**CCA LA-2.** Your comment is noted and will be forwarded to the Board of Harbor Commissioners for their consideration.

**CCA LA-3.** Your comment is acknowledged and appreciated.

**CCA LA-4.** Thank you for your comment. It is acknowledged and will be forwarded to the Board of Harbor Commissioners.